

## **Privacy Policy**

### **Payroll Dynamics, Inc.**

Maintaining the security and confidentiality of client information is a top priority for Payroll Dynamics, Inc (PDI). Our policy as described herein addresses the manner in which we control information about our clients. We define client information as belonging to a specific client concerning the client's current or former relationship with PDI.

#### **Disclosure of Information**

PDI does not sell, license, lease or otherwise disclose your information to any non-affiliated party except as described below. We will share your information only as stated in this policy.

#### **Information Security**

All PDI employees are advised that all client information is confidential and that they are bound by internal policies and procedures to not divulge any client information without proper approval. Employees are subject to disciplinary action, up to and including termination, if they fail to follow our policies and procedures. PDI also maintains physical and electronic safeguards to prevent unauthorized access to client information. We continually assess new technology to upgrade our information security systems. Web service clients are issued a unique account name and/or number, PIN and password to access their accounts. Only a limited number of PDI employees, who have a need to know this information, will have access to both your PIN and password. You should know that you are ultimately responsible for maintaining the secrecy of your PIN and password. We strongly recommend that you not disclose your account password or PIN.

#### **Collecting Information**

PDI collects and uses various types of information to service your accounts and save you time and money. This information generally consists of information gathered from account applications, forms and other information provided by the client whether in writing, in person, by telephone, electronically or by other means (examples of this information are employee names, addresses, Social Security numbers, income, and phone numbers); information about transactions, account balances, payment history and receipt and disbursements of cash; information from a consumer-reporting agency regarding your credit history; and information from other outside sources obtained to verify representations made by the client.

#### **Sharing Information**

PDI may share client information with its affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. In order to ensure that these products and services meet your needs, PDI may share some information with service providers and affiliates.

#### **Sharing Information with Non-Affiliated Companies**

We may share client information with non-affiliated third parties who perform services in connection with servicing or processing of the products and services that we provide. We share information with such companies to support your relationship with PDI. These companies may include financial service providers such as banks, payment processing companies, as well as companies such as check printing and data processing companies. These companies might assist us in a number of ways; e.g., fulfilling employee direct deposit requests, receipt of funds, processing transactions or mailing account statements. Types of information shared are name, e-mail, mailing address, date of birth, employment status, etc.

All non-affiliated third parties, who perform services in connection with servicing or processing of the products and services that we provide, are contractually obligated to keep the information that we provide to them confidential, and use the information only for the purposes of providing the services we've asked them to perform for us or for you.

**Disclosing Information**

We may also disclose your client information to credit bureaus and similar organizations, when permitted by law. Such shared information may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, an audit or examination. In addition, we will exchange client information with reputable reference sources and clearinghouse services for purposes of credit reporting and verification. We may also share information with entities outside PDI for additional services you have requested.

**Accurate Information**

You may review, change or correct your information at any time. You are responsible for maintaining the accuracy and completeness of information required for PDI to provide the services requested. We provide you with access to pertinent information in a number of ways: through account statements, by telephone with our Client Service Department or online access. Please advise PDI if your information is ever inaccurate, incomplete, or in need of updating. If you have any questions, or feel that we have not handled information about you properly, you may always contact our Client Service Department and we will provide an answer or investigate your complaint.

**Updates to our Privacy Policy**

PDI will provide notice to you of any changes to our privacy policy. PDI reserves the right to make changes to this policy at any time for any reason. You can always review our current policy online at [www.payrolldynamics.com](http://www.payrolldynamics.com) or contact us for a copy. This privacy policy applies for Payroll Dynamics, Inc., Medallion Consulting Services, Inc and affiliated Companies.

**Our Former Clients**

Even if you are no longer an PDI client, our privacy policy will continue to apply to your information.

**Legal Notice**

Any dispute over our Privacy Policy is subject to this notice and our Terms and Conditions, including arbitration of disputes and limitation of damage