

Moli Privacy Policy

Effective: June 05, 2023

Committed to Your Privacy

The Moli payment service (“Moli”) is provided by Aptys Solutions, LLC (“Aptys”, “we”, “our”, or “us”). Just like you, we don’t want our private information disclosed where it shouldn’t be, so we work hard to protect your information. We only collect enough of your information to be able to provide this service to you, satisfy any legal requirements, research instances of potentially fraudulent activity, research issues with the service, and promote our other available services to you.

Aptys (<https://aptyssolutions.com>) is solely responsible for the data held within our servers. If you have questions about the privacy policy or how we are protecting your data, you can reach out to us at privacy@moli.me.

Consent

This policy applies to all uses of the Moli mobile application. If you terminate your use of the service, any of your residual data on our servers will continue to be protected as outlined in this policy. Access to this policy is provided before you register for Moli. By registering (becoming a “Registered Person”), you agree to have your data governed as defined in this policy. The policy also applies to your data if someone else enters it into the Moli mobile application, but you have not registered yourself.

Data That Is Collected

The data collected about you is intended only to support the ability to allow you to make and receive payments. Aptys does not sell your data and does not get your data from any commercial source other than you. Data about you may be provided by a Registered Person who is not you.

We collect some of your data for improving our service. This data is in the form of analytics (for performance and experience improvement) and logs (for solving problems).

Registration Data

When you register, we collect your email address, preferred name, first name, last name, and Moli password. The email address is needed to provide a unique identifier so that you can be recognized individually. An individual identifier is important because it prevents confusion when making payments to and receiving payments from other Registered Persons. A unique identifier is also necessary so that your financial institution can identify you when you need assistance. You can change your email address at any time, but you must be able to show that you own the new email address when you do so. The exact same email address cannot be used by more than one Registered Person. When a payment is made from you or to you, your email address appears in the records of the payment that are sent to the payment processors. Your email address is included in the payment information in order to aid research of payment issues. Your email address is also visible to support staff at your financial institution and Aptys.

Your Moli password is not actually stored in the Moli network. Instead, Moli creates, stores, and uses a representation of your password, which means that your password cannot be read or retrieved by us or anyone else through our network. Even though we cannot retrieve your password, that does not mean it is safe to use the same password with Moli that you use for other apps or websites. Using the same password for multiple sites or services is *always* a bad idea. **Aptys personnel will never ask you for your Moli password.** Similarly, your financial institution does not need your Moli password to provide support to you. If you share your password with someone, that person has the ability to take money from your funds account.

Your preferred name is shown to other Registered Persons in Moli, and it is also shown to product support staff at either your financial institution or Aptys. Your first and last name are used to assist in verifying your authorized access to the funds accounts that you connect to Moli, so they are shared with payment processors. They may also be shown to product support staff at either your financial institution or Aptys.

If you register a checking account as your funds account then we collect information about your checking account so that we can properly execute your payment instructions. We collect the routing number of your financial institution (from your personal check), and the account number of your checking account. This account information is shared with payment processors when you initiate a payment and when a payment is sent to you. The last four digits of your account number is also available to your financial institution who holds that account.

If you register a debit card as your funds account then we collect information so that we can reasonably verify that you are the authorized card holder. This includes the card account number, card expiration date, card security code (from the back of the card), name on the card, billing address for the card account, and your phone number. We share all of that data with payment processors so that we can verify the card data and so

that we can execute payments that you request. We share the last 4 digits of the card number with your financial institution who issued the card.

Moli allows a person to register for the service when their financial institution does not participate directly in the service (this means that you can receive payments but you cannot send them). In that case, all of the above applies except that your registration data is not shared with your financial institution directly, but it is shared with Aptys.

Data About Others

When you add contacts who are not already registered in Moli, you provide personal information about those contacts. We keep this data, and the information is used to make payments and notify contacts when you pay them. The information about the contact includes the email address, first and last name, routing number for their financial institution, and their checking account number. Once you enter the checking account information for your contact, you will not be able to see that information in the future. Only your contact will be able to see it if the contact registers with Moli as a Registered Person. After you add a contact, other Moli Registered Persons will be able to pay them as well.

If You are a Contact, But Not a Registered Person

Moli allows a Registered Person to create a contact for a person who is not registered, so Moli stores information about people who are not Registered Persons of Moli ("Unregistered Contact"). The data held about an Unregistered Contact consists of their email address, name, routing number of their financial institution, and their checking account number. This information is used to make a payment to the contact, and to send an email to the contact related to the payment. Records of payments made to Unregistered Contacts are held within Moli.

If you are an Unregistered Contact you may take control of your own data by registering with Moli. When you successfully register with the same email address that is on record for the Unregistered Contact you change from an Unregistered Contact to a Registered Person.

If you are an Unregistered Contact and have a concern or issue about your data within Moli, please email us at privacy@moli.me.

Payment Data

Moli keeps a record of the payments that you make to your contacts and the payments that other people make to you. The information related to payments includes the amount of the payment, who it is paid to or received from, when the payment occurred, and the note associated with the payment. The note that is associated with the payment is shared with the person you pay. Payment notes are generally not available to anyone else but may be included in data requested by law enforcement. Moli may also record location information related to the payment, such as the IP address and geographic coordinates.

Device Data

Attributes of your mobile device (phone or tablet) are collected and stored when you use the mobile app. This data may include but is not limited to the manufacturer and model, serial number, name you gave your device, phone number, time zone, Bluetooth radio identifier and geographic location.

Support Data

When Moli is a service that is provided by your financial institution then your primary point of contact for issues related to Moli is your financial institution. If you contact Aptys we will retain data related to your contact, including your name, phone number, email address, descriptions of the issue, and supporting documents, images, or other files. This data may be held by Aptys indefinitely and made available to any Aptys personnel. This data may also be shared with your financial institution and external service providers to Aptys, in the event that it is needed to resolve the issue.

Sharing Data with Third Parties

Information about Registered Persons and Unregistered Contacts is not shared with any third parties specifically for the purpose of advertising. Personal data is not sold to any third party. However, your existing relationship with your financial institution may allow it to treat your data differently. Aptys does not represent your financial institution, so this policy does not represent commitments by your financial institution. Please consult your financial institution's applicable agreements and disclosures for more information about how it handles your data.

Your Financial Institution

As a Registered Person, your email address, preferred name, first and last name, and a record of your transactions are shared with your financial institution. This includes any financial institution associated with the funds account that you register for making payments. Your financial institution can see that you are a customer of this service, and it can see the history of payments that you make or receive through the service. The payments that you make with the service are also sent to your financial institution so that the payment that you requested can be executed. Notes that you add to payments are not shared with your financial institution. Notes in payments that you receive are also not shared with your financial institution.

If you contact Aptys for support for Moli, we may share all data that you provide to us with your financial institution.

Other Financial Institutions

As a Registered Person, when you make a payment to a contact through Moli, that payment is shared with the contact's financial institution so that the payment can be completed. The payment information may include your email address or name to aid the receiving financial institution in research related to the payment.

Payments Processors and Intermediaries

There are service providers for financial institutions who assist in processing payments, and other organizations that act as an intermediary for banking transactions (such as the Federal Reserve Bank or card networks). When you initiate a payment, each of these service providers may receive a copy of the payment instructions and supporting data for executing payments. Sharing data this way is necessary to execute your payment instruction.

Service Provider	Data Shared	Purpose
Checking account transaction processors	Financial institution routing number and checking account number. Your first and last name and your email address. Payment amounts for transactions.	To execute transactions that involve a checking account.
Card transaction processors	Debit card number, expiration date, and security code. Your first and last name, billing address, and phone number. Payment amounts for transactions.	To execute transactions that involve a debit card.
Card issuers and 3-D Secure processors	Debit card number and expiration date. Your first and last name, billing address, and phone number. Payment amounts for transactions. Data from your mobile device.	To authenticate you for transactions that involve a debit card.

If you contact Aptys for support for Moli, we may share all data that you provide to us with these service providers in order to research and resolve issues.

Law Enforcement

When we are served with a subpoena, court order, or other legal process, or in other situations where we are required by law to do so, we will share your data with law enforcement, the government, or third parties. We also will disclose your data when necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate or prevent violations of our user agreement.

Non-financial Service Providers

Data that you generate may be collected by providers of services to Aptys, but even though the data is collected by service providers, the providers do not have direct access to the data.

Service Provider	Data Shared	Purpose
Sign on credentials	Email address, name, and password	The provider handles storage and validation of your password, and things like password reset.
Analytics	Parts of the mobile app that you use, such as the buttons that you tapped.	This type of data is used to analyze the functionality and effectiveness of Aptys products.
Crash Analysis	Data in the mobile app during a crash	Helps software developers fix issues in the mobile application.

Where is Your Data?

Your data is held in multiple datacenters within the continental United States. Government access to your data is controlled by United States law, and possibly by additional local law where you live.

Under 18?

If you are under 18 years of age, this service is not intended for your use. We'll be very happy to service your payment needs after you turn 18.

What's On Your Phone?

Data Stored on Your Mobile Device

The Moli app stores data on your mobile device, which includes your email address, names, payment history (payments to others and to you), contact list, and data that allows you to sign on with biometric devices (like fingerprint recognition). The Moli app does not store your password, checking account number, or debit card number on your mobile device.

Tracking Technologies

In this context, tracking technologies are software features that allow apps and web sites to track which other apps and web sites you have used or visited. This kind of technology is primarily used for targeting you for specific advertising. We don't track you like this.

How Long Do We Keep Your Data?

There is no limit set for how long data is retained related to your user account and your payment history.

You can see most of the data that we keep about you by using the mobile app. If you change your funds account, name, or email address, the old values will be kept in the system, but you won't be able to see them. You will still be able to see transactions created with any previous funds accounts, though.

The data that we collect for analytics and logs has a limited lifetime and is deleted after two years.

The California Consumer Privacy Act of 2018

Aptys is not subject to [this legislation](#) because the company does not meet the requirements as outlined in Section 1798.140, subdivision (c), paragraph (1). Moli does not provide the ability to see all data held for you, other than the data available from within the mobile app.

Updates to the Privacy Policy

We will change this policy from time to time. When we make material changes to the policy we'll let you know via email or through a mobile app notification. Aptys will also post the current version of the privacy policy at <https://terms.paymoli.app/consumer-privacy-policy.html>. When the policy changes you should read it again to ensure that you understand how your private data is being handled. Your continued use of the Moli service after the privacy policy is changed indicates your agreement with the changes.

Changes

This is a summary of changes to the document. Reading these summaries is not a good substitute for reading the full document, but it helps you understand where and/or why the document was changed.

June 05, 2023 Update

- [Device Data](#) and [Payments Processors and Intermediaries](#) updated to include data related to 3-D Secure authentication

November 30, 2022 Update

- Product name changed from *PayMōli* to *Moli*.
- Changed email addresses from paymoli.com to moli.me.
- Clarified when your data is shared with Aptys.
- Minor grammar changes for clarification.

May 30, 2021 Update

- Changes to include collection and use of debit card data.
- Clarification of use of data under [Law Enforcement](#).
- Changed duration that logs are retained to two years.
- Changed information about how the financial institution can see your account number (only last four digits).

November 02, 2020 Update

- Under [Consent](#), made clear that the policy applies to persons who do not enter their own data, but whose data is entered by someone else.
- Added first and last name to the list of data that is covered by the policy. This affected sections on [Registration Data](#), [Your Financial Institution](#), and [Data Stored on Your Mobile Device](#).
- Added instructions about not sharing your password to [Registration Data](#).
- Added information about data for registered users whose financial institution does not participate in the Moli service to [Registration Data](#).
- Added information about how email addresses are shared with payment processors in [Payment Data](#).
- Added more information about how the payment note is used in [Payment Data](#).