

Privacy Policy

WEX Inc. and WEX Bank (hereinafter collectively referred to as "WEX") recognize the importance of protecting your privacy and safeguarding the confidentiality of your sensitive information. Because of this, WEX® offers the following statement of our joint commitment to privacy protection. This policy relates specifically to your use of WEXOnline. For more detailed information on WEX's privacy policy please refer to www.wexinc.com or www.wexcorporatecard.com. Information privacy is important to you. Protecting your information privacy is critical to us. Therefore, we commit to:

- Adhere to our privacy policies
- Give you clear notice of what information we ask you to divulge and what information we collect from you
- Clearly explain how we will use the information that you provide to us
- Share your information only with whom and in such manner as is described in this policy
- Implement and utilize safe and secure physical and information systems to protect private information.

Information That We Collect and Its Use

1. Transaction Data

When a cardholder uses their WEX Commercial Card we collect transaction data which may be viewed via your WEXOnline account. Such data typically includes the following information:

- Name of cardholder
- Transaction Date
- Card/account number
- Total dollar amount of transaction
- Vehicle Number, if any
- Driver identification number, if any
- Vehicle odometer reading, if any, as entered by the cardholder
- Amount of fuel purchased, if any
- Price per gallon of fuel purchased, if any
- Non-fuel items purchased, if any
- User established product restrictions, if any
- Merchant at which the transaction occurred
- For certain programs, cardholder contact information

WEX uses transaction data gathered when you use your WEX Commercial Card for the purpose of processing the transactions as well as for other lawful commercial purposes. The transaction data is critical to our ability to provide billing, electronic bill paying and presentment products ("EBPP") and reporting to you.

For some WEX commercial card programs, transaction data is collected by a third-party processor and transmitted to WEX. Please refer to Section C(2) below for additional information about information sharing with third parties.

2. Web Tracking Software

WEX utilizes web tracking software that allows us to collect and store information such as the name of the domain from which you access the Internet, the date and time that

you access our site, the Internet address of the website from which you linked to our site, and the pages that you visited while on our web site.

WEX uses the information collected as a result of our web tracking software to help diagnose problems with our server, to track user traffic patterns, and to administer our website. This information allows us to determine which areas are of most interest and use to our visitors, which avenues of site promotion are most effective and at what time we can expect peak usage.

3. Supplemental Information.

WEX may supplement the information that you provide with additional information we receive from third parties, including service providers, credit bureaus and industry trade groups. We treat any supplemental information we receive from third parties as carefully as the information that you provide to us directly

WEX may use aggregated application information or transaction data for internal and external analytical purposes. Further, WEX may utilize aggregated information or data for marketing purposes. However, aggregated information and data will not be identified with any particular applicant, individual customer or individual cardholder.

With Whom We Share the Information We Collect

1. Within Our Company

Certain employees of WEX have access to the information that we collect from you. All employees of WEX are required to maintain and keep all such information confidential and to abide by the terms of this policy for WEXOnline® as well as the Joint Privacy Policy for WEX Inc. and WEX Bank.

WEX may use the personally identifiable information that you provide, such as your postal address and/or e-mail address to send promotions or solicitations for products or services.

2. With Third Parties

WEX may from time to time retain the services of third-party technical service providers and consultants. These third parties are only allowed access to the information that we collect to the extent that is required for them to perform the tasks for which they were retained. These third parties are contractually obligated to maintain confidentiality and further must agree to be bound by WEX's privacy policies and applicable confidentiality agreements.

If a customer uses a Co-Branded or Private Label card, the Co-Brand or Private Label partner is given limited access to transaction data that allows them to determine what products are purchased by the customer and to tailor their services accordingly.

Certain Co-Brand or Private Label partners may be provided with aggregated customer information to be used for internal and external analytical purposes. WEX may also sell aggregated customer information to third parties for marketing or other purposes. Such aggregated customer information does not identify any particular applicant, individual customer or individual cardholder.

WEX also shares limited transaction information with merchants who accept our cards. The information that is provided to merchants is limited to transaction exceptions that provide justifications to the merchant when we will not reimburse them for a transaction (e.g. Invalid Fleet or Invalid Vehicle). Such information sharing serves the additional purpose of assisting WEX and the merchant in identifying and correcting processing errors to make our products easier and more convenient to use.

Subject to applicable legal restrictions, WEX may sell the personally identifiable information that we have collected about certain of our commercial customers to third parties for marketing purposes if we reasonably believe that such third parties can offer products or services that would be beneficial to those customers.

WEX may disclose or exchange with third parties any information that you have provided to us if we believe in good faith that the law requires us to do so or if it is necessary to protect the rights or property of WEX or our users. Additionally, as we continue to grow as a business, we may acquire or be acquired by another company. In such a transaction, customer information will most likely be one of the transferred assets.

Additional Privacy Issues

1. Consumer Privacy Rules

The objective of this WEXOnline Privacy Policy is to provide you with a clear, concise and accurate statement of how WEX handles customer information. Please note that our products and services, including WEXOnline, are intended to be used only for commercial and business purposes. As our products and services are not intended to be used for personal, family or household purposes, consumer privacy protection laws and regulations, including (without limitation) the federal Gramm-Leach-Bliley Act, do not apply to our information handling practices. This Privacy Policy is not a statement of intent to be bound by or comply with such laws and regulations.

2. Security

WEX recognizes the importance of secure online interaction, and we utilize a number of methods to safeguard your transmissions. Our website is hosted on secure servers with firewall protection. We maintain Secure Site status that is verified by security industry leader VeriSign, Inc. All information gathered on our website is encrypted during transmission with 128-bit SSL RSA-encryption and stored within secure databases protected by multiple firewalls. As effective as current encryption technology is, however, no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information provided via our website will not be intercepted while being transmitted to us over the Internet.

3. Children

WEX provides only business services and does not intend to collect or knowingly collect any information from or about children. It is possible that a child may impersonate a company representative and attempt to access or use WEXOnline and, in so doing, provide the child's name, address, phone number, fax number, email address and other identifying information. When such information is received and WEX is aware that the individual providing the information is a child, the information is used only to reject the child's application and is immediately deleted by WEX. Such information is never shared

with third parties. WEX cannot always determine if a visitor to its website or the sender of an email is a child.

4. Cookies

Our website makes use of a standard feature of browser software called a "cookie" to assign each visitor a unique, random number. A cookie is a file that identifies a computer as a unique user. Cookies may be used to facilitate your use of our website, to maintain site security and to improve our website. Most browsers are initially set up to accept cookies. You may be able to reset your browser to refuse all cookies or to indicate when a cookie is being sent. If cookies are disabled, however, our website (and other websites) may be harder to use. A cookie can not read data stored on the hard drive of a computer.

5. Links to Other Sites

Our website contains links to other sites whose information practices may be different than ours. If you click on a banner or other hyperlink, you may be transferred off of WEXOnline. Our inclusion of hyperlinks to these web sites does not imply any endorsement of the material on such web sites or associations with the operators of the websites. Our privacy policy does not extend to these sites or the internet. You should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties and how that information is used.

Privacy Policy Changes

WEX reserves the right to change our policies (including this Privacy Policy) at any time. If we decide to change this Privacy Policy, we will post such changes to our website so that you may be aware of our actions. Any change to this Privacy Policy will become effective thirty (30) days after it is initially posted on our website.