

Privacy

This privacy policy discloses the privacy practices for payments.msbpay.navient.com and other MSB mobile apps and online services (the "Site"), which is operated by Gila LLC d/b/a Municipal Services Bureau (MSB), including its subsidiaries and affiliates under common ownership, ("MSB", "we", "us", "our") on behalf of its clients. We are committed to protecting your privacy. This policy applies to individual consumers whose information we obtain while providing services to or on behalf of our clients. We may collect and use Personal Information and Other Information about you to conduct and manage our business, including operating and improving the Site and our service offerings, to process your transactions, deliver our services, to fulfill legal and regulatory requirements, let us know which emails have been opened by you to understand the effectiveness of our communications and to make those communications more useful to you, and as otherwise permitted by applicable law. "Personal Information" is any information that alone or together with other information in MSB's possession relates to an identified or identifiable person, such as name, phone number, email, address, and online account information such as username, password, and account number.

Personal Information We May Collect includes the following:

- Personal Information we receive from the entity on whose behalf we provide services (the "Client") and from information or applications submitted by you to the Client. Such information may include information about your account with the Client, including transaction data and history when you pay for goods and services from the Client, account number, and balance owed.
- Personal Information we receive from you voluntarily while using the Site, and which may include your name, address, driver's license and vehicle information, phone number, email address, credit or debit card information, and checking or savings account information.
- Personal Information we receive from other third parties, such as third-party service providers who provide payment account validation or processing services. Such information may include bank account owner information and account balance.

Other Information

We automatically collect information about you, such as device ID and other information when you visit the Site to help us improve and provide services to you on behalf of the Client. This type of information does not identify you personally ("Other Information"). "Other Information" is any additional information that is not Personal Information, such as information about usage of the Site that does not identify you personally or certain information that we or third parties collect about you in other contexts. If we combine Other Information with Personal Information, we will treat the combined information as Personal Information in accordance with this privacy policy.

The types of Other Information we collect:

- Device ID such as your internet protocol (IP) address (IP address is a number assigned to a device connected to the internet)

- Information collected through cookies and other technologies

We may place and read data stored (via session and/or persistent "cookies" or other device specific storage capabilities) on the device you are using, and use other technologies such as web beacons, clear GIFs, tracking pixels and tags, when you visit or use the Site. Cookies are small data files that are placed on your device for a variety of purposes, including to identify your device or your account when you return to the Site. A web beacon is an electronic file or code that usually consists of a single-pixel image or tag that is embedded on a website or in an email. We and our service providers may use web beacons and cookies to determine whether and when you receive and open our emails; these beacons and cookies may also capture information such as the type of device, operating system, email program, and web browser used to view the email, the IP address from which you opened the email, whether you click on any links in the email, and which documents you download. These technologies enable us to gauge the effectiveness, relevance, and value of our email communications, to communicate important notices to you electronically, and to comply with applicable law. You can generally remove, block, or disable cookies by using the settings located in your browser. If you decide to remove or not accept cookies, some features and services on the Site may not work properly. To the extent permitted by applicable law, third parties, including our service providers, may collect information about your online activities over time and across different sites, including when you visit the Site. In particular, the Site may use [Google Analytics](#) to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics [here](#). Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. Currently, we do not respond to browser "do not track" signals. This Site also may use reCAPTCHA, which helps protect websites from spam and abuse. The Google terms of service and privacy policy for reCAPTCHA apply. You may review the terms of service and privacy policy [here](#).

How We Share

We only share your Personal and Other Information to affiliated and non-affiliated third parties as permitted or required by applicable law. We may disclose your information to MSB affiliates for the purposes described in this privacy policy. Additionally, we may share your information with our Client with whom you have an account in accordance with our contract and for their business and accounting purposes. We may share your information with our third-party service providers that provide services to us, such as payment account validation to detect and protect against fraud and theft, data storage providers, payment processing functions, or other services. When making a payment on the Site, your information may be shared with various payment industry organizations that we partner with to process your transaction, such as financial institutions, banks, card networks (e.g., Visa and Mastercard), card issuers, and merchant acquirers. When we share your information with service providers that we contract with, they are required to limit their use of your information to the particular purpose for which it was shared, and they are not allowed to share it with others except to fulfill that limited purpose. Payment industry organizations that you have a relationship with, such as your card issuer, bank, or the card network associated with your card, and our Client with whom you have an account may further share your information with third parties. Please review the applicable organization or Client's privacy policy for more information regarding their privacy practices.

Security

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. You may have other privacy protections under state laws. These measures

include computer safeguards and secured files and buildings. Nevertheless, it is crucial that, as a user, you protect against unauthorized access to your computer and that you always sign off when finished using a shared computer. Further, you should be aware that no system is impenetrable. Thus, it is your responsibility to diligently monitor your credit card statements, bank statements and similar personal information to discover and address as quickly as possible any misuse of your personal information.

Children's Privacy

We do not intend to collect personal information from children under 13 years of age. If we learn that we have collected this information from a child under the age of 13, we will promptly take all reasonable steps to delete the data from our system.

Policy Changes

The effective date of this policy is June 2024. It replaces all prior privacy policies issued by MSB for this Site. We reserve the right to amend this privacy policy at any time and we will inform you of any changes to this policy by posting the revised privacy policy on the Site, or as otherwise required by law.

Contact Us

For more information regarding this privacy policy, please contact us at:

Consumer Privacy
MSB
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