

## EBLESS Global Privacy Policy

Last updated: July 10, 2022

<b>FACTS</b>	<b>WHAT DOES EBLESS DO WITH YOUR PERSONAL INFORMATION?</b>
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number and account balances</li> <li>• Transaction history and income</li> <li>• Account transactions and checking account information</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons EBLESS chooses to share; and whether you can limit this sharing.

<b>Reasons we can share your personal information</b>	<b>Does EBLESS share?</b>	<b>Can you limit this sharing?</b>
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No

For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

Questions?	By email: <a href="mailto:jmatthews@ebless.app">jmatthews@ebless.app</a> By phone number: 1.800.325.4730
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## WHO WE ARE

Who is providing this Privacy Policy?	This privacy notice is provided by EBLESS.
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## WHAT WE DO

How does EBLESS protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does EBLESS collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Pay your bills or make deposits or withdrawals from your account;</li> <li>• Provide account information or give us your contact information;</li> <li>• Show your government issued ID.</li> </ul> We also collect your personal information from other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes — information about your creditworthiness</li> </ul>

	<ul style="list-style-type: none"> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.</p>
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**DEFINITIONS**

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Nonaffiliates we share with can include direct marketing companies.</li> </ul>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Our joint marketing partners include financial service companies.</li> </ul>

**OTHER IMPORTANT INFORMATION**

California: If your EBless account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your EBless account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

**EBless Master Privacy Policy**

This Privacy Policy sets forth how personal information is collected and used, that is provided on Internet Web site located at [www.eBless.com](http://www.eBless.com) (the “Site”) and our mobile application (collectively, “EBless Technology”). Unless otherwise indicated, this Privacy Policy only applies to personal information collected through EBless Technology by EBless or any of their respective affiliates (together, for purposes hereof, “EBless”). By using the EBless Technology, you agree to be bound by this Privacy Policy and our Terms of Use, as they may be amended from time to time in the future (see "Change to this Privacy Policy" below).

EBless is committed to maintaining the confidentiality, integrity and security of any personal information about our users. This Privacy Policy explains how we protect personal information provided through the EBless Technology and how we use that information in connection with our service offered through the EBless Technology (the "Service" or "Services"). "Personal information" for purposes of this Privacy Policy means information that identifies you, such as your name, address, phone number, fax number or email address.

EBless stresses its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

The information we collect about you depends on the information you provide us and how you use our Service. We collect information:

- When you provide information directly to us;
- Through automated technology when you use the Service; and
- From other sources.

### **Personal Information Collected Directly from You**

We collect the following personal information when you provide it to us:

- contact information such as name, email address, mailing address, phone number;
- billing information such as credit card number, and billing address;
- financial information such as bank or brokerage account numbers, types of investments;
- Social Security number;
- driver's license number;
- unique identifiers such as username, account number, password;
- preferences information such as product wish lists, order history, and marketing preferences; and
- demographic information such as age, education, gender, interests, and zip code.

### **Information Collected Through Automated Technology**

When you visit the Site or download and use our Services, we may automatically collect certain information sent to us by your computer, mobile device, or any other device. This information may include the type of device you use, operating system, the device identifier (or "UDID"), your IP address, location, mobile network information, and standard web log information, such as your browser type traffic to and from our site, the pages you accessed on our website, and other available information. We may also collect information about your use and interaction with the Site, our mobile application, or our Services. For example, we may evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of the Services. When you use the Services, we may also store information based on your usage history. This includes, but is not limited to, details of your purchases, content you viewed, event

information, click stream information, and cookies (see Cookies/Tracking section below) that may uniquely identify your browser or your account.

### **Information Collected From Other Sources**

We may also receive information about you from other sources, such as payment, analytics, and security service providers, affiliates, joint-marketers, social network platforms, and others, consistent with any privacy or sharing choices you have made with any third-party platform.

### **Information Use and Sharing**

EBless uses and discloses your personal information only as follows:

- to analyze site usage and improve the Service;
- to deliver to you any administrative notices, money alerts, and communications relevant to your use of the Service;
- to fulfill your requests for certain products and services;
- for market research, project planning, troubleshooting problems, and detecting and protecting against error, fraud, or other criminal activity;
- to third-party contractors that provide services to EBless and are bound by these same privacy restrictions;
- to enforce EBless' Terms of Use; and as otherwise set forth in this Privacy Policy; and
- other purposes for which we seek your consent.

In the event that you access the Service as brought to you by one of our co-brand partners, through a co-branded URL, your email address used for registration on the Service may be provided to that co-brand partner.

In addition, we may, from time to time, offer promotions with various businesses, websites, mobile applications or third parties, which may include opportunities for you to earn deposits within your EBless account. Each such promotion will be subject to and governed by our Terms of Use, this Privacy Policy, and any applicable rules or terms and conditions we may post online, post in our mobile application, include within e-mail or other communications, or otherwise make available to you. To the extent you elect to participate in any such promotion or otherwise make any purchase subject to a promotion, we may share personal information such as name, e-mail address, purchase dates, and other related information with the applicable third party for the limited purpose of allowing the parties the make the promotion available and track participation within such promotion.

With your consent, we may use information you provide to connect you with people you may already know. For example, through our mobile application you may give us permission to identify contacts within your address book as potential new users of EBless. We may match the contact information you provide to the information provided by other users to improve the Service to make it easier to find contacts you may refer to EBless that are not already customers.

We may also disclose your personal information when we believe in good faith such disclosure is required by law, such as to comply with a subpoena, or similar legal process and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

If EBless is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

### **Third Party Services**

Please be aware that third-party websites accessible or recommended through our Services may have their own privacy and data collection policies and practices. These links and features are provided for your reference and convenience only and do not imply any endorsement of information provided through these third-party links and features, nor any association with their operators. We are not responsible for any actions, content of websites, or privacy policies of such third parties. We urge you to read the privacy and security policies of these third parties.

EBless uses Plaid Inc. (“Plaid”) to gather your data from financial institutions. By using the Service, you grant EBless and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid end user privacy policy (Plaid Privacy Policy: <https://plaid.com/legal/#end-user-privacy-policy>).

If you access EBless to transfer funds to an EBless account holder, you authorize the sharing of your name, the status of your gift, and the amount of the transfer with the recipient EBless account holder. In addition, we use third party payment processors to complete the financial transaction on our behalf. The use of personal information by those processors is governed by their privacy policies, which will be made available during the EBless checkout process.

### **Your Choices about Your Personal Information**

If the personal information on file for you changes, or if you no longer desire our service, you may correct or update it by making the change on our customer information page or by emailing EBless.

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at the information below.

If you have agreed to receive text messages from us, you can choose to opt-out at any time by replying STOP.

## **Retention of Your Personal Information**

We will retain and use your information as necessary to complete the purpose for which it was collected, comply with our legal and/or regulatory obligations, resolve disputes, and enforce our agreements.

## **Cookies / Tracking Technologies**

A cookie is a small text file that is stored on your computer. We use cookies for a variety of purposes, including for record-keeping and to help us understand your use of the Site, allow us to improve it, and personalize it for you. We use cookies on the Site. We do not link the information we store in cookies to any information that directly identifies you that you submit while on the Site.

We and our service providers use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" directory.

If you limit or reject cookies, you may still use the Site, but your ability to use some areas of the Site, such as contests or surveys, may be limited.

Our Site and Service may contain links to third-party services, as further described in the "Third Party Services" section above. Any cookies or tracking technologies used by such third parties are outside of the scope of this Privacy Policy.

You can control cookies through browser settings and other controls:

You can manage cookies through controls on your web browser. As controls vary from one web browser to another, you should visit your web browser's help menu for more information on cookie preferences. You can also configure your browser at any time to be notified of the receipt of a cookie, so that you can decide whether you want to accept it or not.

To opt out of analytics cookies managed by our third-party analytics partners, either use the browser controls discussed immediately above, or use the analytics opt-out mechanisms maintained by our analytics provider Google Analytics: Google Analytics Opt-out Browser Add-on: <https://tools.google.com/dlpage/gaoptout>

## **Children's Privacy**

Our Services are not directed at children. If we become aware that we have collected data without legally valid parental consent from children under 13 years of age, we will take reasonable steps to delete it as soon as possible.

## **Notice Concerning Do Not Track**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. At this time, we do not recognize or respond to DNT signals.

## **Security**

The security of your personal information is important to us. When you enter sensitive information, such as a credit card number or financial information, on our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We have implemented reasonable and appropriate measures to protect the security of the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on the Site, please contact us using the information listed in the “Contact Us” section below.

## **California Collection Notice**

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and share your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”)), other than the personal information we collect in connection with providing financial products and services.

Depending on how you interact with our website and services, in the preceding 12 months, we may have collected the following categories of personal information about you, in addition to the information we collect in connection with providing financial products and services:

- Identifiers, such as your name and contact information, IP address, and mobile device identifiers
- Commercial information such as purchase history
- Internet usage information, such as browsing history, access history, and use and interaction with our website.

In the preceding 12 months, we have used and disclosed this information for the purposes and to the categories of third parties described above.

## **Your California Privacy Rights**

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business



or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.

- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.
- Opt you out of the sale of your personal information. As noted below, we do not “sell” your personal information, as that term is defined by the CCPA.

You may have the right to receive information about the financial incentives that we offer to you for your personal information (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Services to you and for compliance with applicable law. If you ask us to delete certain information, you may no longer be able to access or use the Services.

To exercise your rights, please send us an email at [jmatthews@ebless.app](mailto:jmatthews@ebless.app). You will need to provide additional information to verify your identity before we fulfill your request. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

The CCPA sets forth certain obligations for businesses that “sell” personal information. Based on the definition of “sell” under the CCPA and under current regulatory guidance, we do not believe we engage in such activity and have not engaged in such activity in the past twelve months. We share certain information as set forth in the Information Use and Sharing section, above, and allow our service providers to collect certain information about your activity, for example through cookies as explained in Cookies / Tracking Technologies section, above.

### **California Shine the Light Disclosure**

The California “Shine the Light” law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes within the meaning of that law.

### **Information for Nevada Residents**

Certain Nevada consumers may opt out of the sale of “personally identifiable information” for “monetary consideration,” as defined under Nevada law, to a person for that person to license or sell such information to others. We do not engage in such activity; however, if you are a Nevada resident who has purchased goods or services from us, you may submit a request to opt out of any future sales under Nevada law by contacting us as detailed in the “Contact Us” section below. Please note we may take reasonable steps to verify your identity and the authenticity of the request.

## **Changes to this Privacy Policy**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. By continuing to use our Services, you are confirming that you have read and understood the latest version of our privacy policy.

## **Contact Us**

If you have any questions about our Privacy Policy, please contact EBless Customer Service at:

By email: [jmatthews@ebless.app](mailto:jmatthews@ebless.app)  
By phone number: 1.800.325.4730