

# OUR PRIVACY POLICY

## Scope

This Privacy Statement describes Instant Financial's collection, use, disclosure, and protection of your personal information collected or provided through our websites and devices or applications ("Site") and how we use personal information in connection with our services offered through the Site ("Services"). It applies to any Site where this Privacy Statement is referenced or linked to.

"Personal information" is information that identifies you and is associated with a specific person. Personal information does not include information that is anonymous, aggregated, or is no longer identifiable to a specific person.

By using our Site, Service, or providing us your personal information, you agree to this Privacy Statement. If you do not agree with any term in this Privacy Statement, please do not provide us your personal information or use the Site.

Information we process may be transferred to, stored, and processed in, the United States or Canada or any other country in which Instant or its affiliates, subsidiaries, or service providers maintain operations. By using and providing information to us through the Site or Service, you agree and consent to the transfer, storage, and processing of your information to any such country in order to provide the Site and Service.

Our Site and Services are not intended for children under the age of 13 or if you are not of a legal age to form a binding contract with Instant. We do not knowingly collect personal information from these individuals.

## INFORMATION WE COLLECT

We may collect the following categories of personal information about you through the Site, including but not limited to:

- Registration information: When you register for a Service, you will be asked for basic registration information, such as an email address and password.
- Identification information: You may also be asked to provide identification information to confirm your identity, including your first and last name, username, address, birth date, photo image of yourself, photo of your identification documents, and phone number.
- Payment account information: For certain Services, including our Transfer to Bank Account, you will be required to provide your bank account number and routing number.
- Contests and surveys: From time to time, you may be offered an opportunity to participate in a contest, survey, or other promotion. We may collect or you may submit information in connection with one of these promotions.
- Technical and navigational information: We collect information about your interaction with our Site such as computer browser type, pages visited, average time spent on our Site, IP address, unique identifier of the device, operating system version and app version.
- Location information: If you choose to use a location enabled Service, we may collect location information from your device and will notify you of this collection. You may control or disable the sharing of location information via your device setting and/or the Site.
- Other information: We may request or receive other personal information such as feedback, questions, comments, suggestions, or ideas to provide you with other benefits or to improve upon the Service. In such instances, you will be given the opportunity to provide or decline that information.

## HOW WE USE THE INFORMATION WE COLLECT

We use your personal information to:

- fulfill your requests for certain products and Services;
- respond to your inquiries about our Services;

- analyze Site usage and improve the Services provided through the Sites;
- alert you to software compatibility issues and to improve our web design and functionality;
- deliver to you any administrative notices or alerts and communications relevant to your use of the Services;
- offer you other products, programs, or services that we believe may be of interest to you;
- perform market research, project planning, product development, troubleshooting problems, analysis of user behavior, marketing and promotions;
- detect and protect against errors, fraud, or other criminal activity;
- enforce our End User License Agreement and as otherwise set forth in this Privacy Statement; and
- in connection with a merger, sale, of substantially all of our assets, or corporate reorganization.

In order to allow you to use certain Services, we may be required to verify your identity. To do so, we may, directly or through third parties, use information you provide to order a credit report or to verify information you provide against third party databases or through other sources. We may also use your information to verify your identity in the event you contact us for assistance with the Sites or Services.

We may use your information to pre-fill form fields on the Sites for your convenience.

We may use the bank account you provide to confirm your account is valid and to access funds from your accounts pursuant to your instructions in connection with our Transfer to Bank Account service or in connection with payment for services that you subscribe to.

We may use information you provide about Third Party Sites to provide the Services, which may include accessing the Third Party Sites you select on your behalf, so that we can present the requested information to you. When you use

the Mobile Application or mobile versions of our Sites, we may collect the unique device identifier assigned to that device by phone makers, carriers, or makers of the operating system (the “Device ID”). Device IDs allow app developers, advertisers, and others to uniquely identify your device for purposes of storing application preferences and other data.

We may use your Device ID for security purposes. For example, if you have activated a feature that limits access to a Service from a specific device, our systems will access the Device ID from each device you attempt to access the Service with to determine if the device is the specific authorized device. Additionally, we may use Device IDs to monitor suspicious activity. For example, if we detect that a single account on a Site is being accessed from multiple devices, as determined by tracking the Device IDs that access an account, we may contact the user to ensure that such access has been authorized by the user.

## HOW WE DISCLOSE PERSONAL INFORMATION

We will not, without your permission, sell, publish, or share your personal information to third parties for their marketing purposes.

Instant Financial may share your personal information with its affiliates and subsidiaries, to provide joint content, products, services, and for everyday business purposes. Instant Financial may share your personal information with its affiliates and subsidiaries to provide joint content, products, services, and for every day business purposes. Our affiliates and subsidiaries will send you marketing communications only if you have requested their services.

In connection with our Transfer to Bank Account service, we may share some of your personal information with third parties you are attempting to transfer funds to in order to process the transaction you have requested.

We may share your personal information with third party service providers to enable them to assist in fulfilling the requests you make or the transactions you conduct via the Sites, including the operation of certain Site functions and

Services. Third parties acting on our behalf that are given access to your personal information are contractually obligated to abide by our privacy practices and are not allowed to use the information for any other purposes.

We reserve the right, in our sole discretion, to share or disclose your personal information with law enforcement, government officials, and other third parties:

- to respond to subpoenas, court orders, or legal process;
- in order to investigate, prevent, defend against, or take other action regarding violations of our End User License Agreement, illegal activities, suspected fraud, or situations involving potential threats to the legal rights or physical safety of any person or the security of our network, Sites or Services;
- to respond to claims that any posting or other content violates the rights of third parties; in an emergency, to protect the health and safety of our Sites' users or the general public; or
- as otherwise required by any applicable law.

We may share your personal information with other third parties with your consent or instructions to do so.

We may share or make available anonymous or aggregate information that cannot be used to identify you individuals with:

- third parties for their research, marketing and promotional purposes and those third parties may publicly report the findings of their research or analysis;
- organizations that conduct research into consumer spending; and
- users of the Service for purposes of comparison of their personal financial situation relative to the broader community.

If our company or our assets are acquired by another company, or in the event of a merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties, information concerning your relationship with us, including, without limitation,

personal information that you provide and other information concerning your relationship with us. Such third parties will assume responsibility for the personal information collected by us in connection with our business operations or through our Sites and such third parties will assume the rights and obligations regarding such information as described in this Privacy Statement.

## HOW WE PROTECT THE INFORMATION WE COLLECT

We take the security of your information seriously. We use technical and administrative security measures such as but not limited to firewalls, encryption techniques, and authentication procedures, among others, to maintain the security of your online session.

## YOUR CHOICES

We may send periodic Site related alerts, weekly summaries, notifications, newsletters, promotions, or other information via email. You may choose to stop receiving alerts, summaries, newsletters and promotions by indicating your preference in your account profile or settings. You may also follow the unsubscribe instructions in the email you receive. Please note that certain Services-related messages that we send are necessary for the proper functioning and use of the Services and you may not have the ability to opt-out of those messages.

## HOW WE USE COOKIES AND SIMILAR TECHNOLOGIES

To help operate the Site, enhance you experience, and collect information about online activity, we may place small data files on your computer or other device. These data files may be in the form of cookies, pixel tags, local shared objects, or other similar technologies. Cookies and similar technologies enable us to personalize our Site and Service for you. These technologies may allow us to store and manage you preferences and settings, measure and analyze how you use our Site and effectiveness of our communications, offer targeted

products, programs and services, and help us improve our products, services, and security.

Most browsers provide you with the ability to block, delete, or disable these technologies. If you choose to reject cookies or similar technologies, some Services may not be available or some functionality may be limited or unavailable. Please review your browser manufacturer's help pages for assistance with changing your settings.

## DO NOT TRACK NOTICE

Without an industry or legal standard of interpreting Do Not Track Signals ("DNT") sent to us by your browser, we do not respond to DNT signals at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

## CHANGES TO YOUR PERSONAL INFORMATION

You may access, review, and update much of the information you have submitted to us at any time via the Site or Service.

You may choose to close or request that we delete your account for the Service at anytime. We will use commercially reasonable efforts to remove your information, although some information may be retained. For example, some information may be retained on a backup server or media, which is necessary to help ensure continued availability of our Service.

We retain your personal information as long as necessary to provide the services you have requested. Additionally, we may retain personal information to comply with law, prevent fraud, resolve disputes, trouble shoot problems, enforce our End User License Agreement, and as permitted by applicable law.

## CHANGES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement periodically. Changes are effective immediately upon posting. The date last revised appears at the top of this Statement.

## GOT QUESTIONS

If you have questions or concerns regarding this Privacy Statement, our security practices, or our information handling practices please contact:

Instant Financial Support at [support@instant.co](mailto:support@instant.co).