



United States and Canada Privacy Policy

Who We Are

This Privacy Policy is provided by Finicity Corporation (“Finicity”) including, but not limited to Finicity’s online services (i.e. Mvelopes). Finicity and its services are referred to as “we”, “us”, or “our” in the policy.

We are committed to respecting your online privacy and has created this Privacy Policy to demonstrate our commitment to the protection of your personal information. This Privacy Policy applies to any personal information you provide to us, or that we collect through our websites or other electronic forms of communication. By accessing or using any part of our websites, applications, or financial data sharing services (collectively the “Services”), you agree to the collection and use of your personal information according to the terms set forth in this Privacy Policy.

INFORMATION WE COLLECT AND WHERE IT COMES FROM

Information You Provide Or Give Access To

When you utilize or test our services, we may collect information about you through your direct input or through other sources permitted by you (including your financial institutions and payroll providers), and/or applicable law, including but not limited to your:

- Name;
- Address;
- Phone Number;
- Email Address;
- Username;
- Passwords;
- Personal Identification Numbers (PINS);
- Date of Birth;
- Social Security Number;
- IP Address;
- Bank Statements;
- Bank Transactions;
- W-2s and other tax related documentation; or
- Paystubs;

Additional Information and Collection

To maximize the value of the Services, we may request you to provide additional information. Whenever we ask for additional or optional information, we identify those fields appropriately so you may know what information is required to provide the requested Service. If you choose to withhold any personal information requested by us, it may not be possible for you to gain access to certain parts of the Services you wish to use, or for us to respond to you appropriately.

Any information collected from our users is not sold nor is it shared or rented to others in any such way that is different from what is disclosed in this Privacy Policy.

Information We Collect Automatically

Log Information. We collect information about your computer or web browser in order to analyze trends and administer our websites. This information is collected in a generic aggregate format and is not linked to personally identifiable information.

Cookies. In order to better serve you and protect your account information, we use “Cookies,” nuggets of data that are stored on your hard drive as a file. Cookies data are usually stored on your computer’s hard drive as a file in a web browser folder called “Cookies,” and you can delete this file anytime you choose. The cookies used on our Services are valid only for the current session and become invalid shortly thereafter. Cookies created by our Services will only work with our Services.

Notwithstanding any provisions of this Privacy Policy to the contrary, we collect and may share or publicly disclose compiled, de-identified, aggregated data concerning financial transaction of our users. This

information is collected in a generic, aggregate format and, to the extent it is shared or disclosed, will not contain any personally identifiable information.

HOW WE DISCLOSE AND USE INFORMATION

We will use your information in a manner consistent with this Privacy Policy. The following are examples of how we use the information we collect from you:

- To verify your identity, which is required to give you access to our Services;
- To verify your accounts and establish the requested service with the service provider(s) of your choice, including financial institutions, brokerage houses, and credit card companies;
- To perform services on your behalf or for a service provider;
- If you subscribe to a Service requiring payment, to process the initial payment and all subsequent payments;
- To help us improve and personalize the content and functionality of our Services;
- To help us understand your usage of the Services to improve the Services;
- To communicate with you regarding customer service matters, questions and other various comments you may send to us;
- To inform you about products, services, offers, and events we offer or sponsor, and to provide news and other information we believe may interest you;
- To communicate various technical and administrative messages regarding the Services, including notices of technology updates;
- To offer you the option to participate in contests or surveys regarding the Services;
- Auditing related to a current interaction with the consumer and concurrent transactions;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration;
- To maintain legal and regulatory compliance;
- To enforce compliance with our Terms and Conditions and Policies; and
- For any other purpose disclosed to you at the time we collect or receive the information, or otherwise with your consent.

Promotions. When we send you promotional information, we give you the opportunity to opt-out of receiving further information. Simply use the unsubscribe feature provided within each email or contact us at (support@finicity.com). If you opt-out from receiving promotional materials, you may continue to receive important service announcements, which contain information about the Services to which you subscribe.

How We Share Your Information

In order to keep costs low and process your services as efficiently as possible, we utilize third party services that may have access to your personal information for a variety of reasons. We only provide this information with any third party after they have a signed confidentiality contract with us and the personal information is only provided for business purposes. The information you provide us will be shared only in limited circumstances, including, but not limited to:

- With your consent and at your discretion;
- With our-approved partners with whom you have enrolled for services after coming to us;
- With third party service providers whom we employ to provide marketing, security, development or other business processes or to provide services on our behalf;
- When we reasonably believe such disclosure is required to comply with the law, an investigation or other legal process, such as a court order or a subpoena; or
- In connection with a sale, merger, transfer, exchange or other disposition of all or a portion of a business operated by us.

How We Handle / Secure Your Information

Because we are trusted with your personal information, we have implemented administrative, technical, and physical security controls that are designed to safeguard your personal information. We maintain physical, electronic, and procedural safeguards that comply with applicable state and federal standards to guard your personal information held by us relative to the Services.

Please recognize that protecting your personal information is also your responsibility. We urge you to take every precaution to protect your information when you are on the internet, or when you communicate with us and with other parties through the internet. Change your passwords often, use a combination of letters and numbers, and make sure you use a secure browser. If you have reason to believe that your interaction with us or our partners is no longer secure, please let us know immediately by contacting us as indicated in the Contact Us section below.

By using our Services, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security breach involving your Personal Information, we may attempt to notify you electronically by sending an email to you. To withdraw your consent to receive electronic notice of a data breach, or if you have any questions about the security of your personal information, please email us at privacy@finicity.com.

Our Legal Basis For Handling Your Information

Some jurisdictions require us to disclose the legal basis on which we rely to use or disclose your information. To the extent those laws apply, our legal basis are as follows:

- **Consent:** Where required by law, and in some other instances, we handle your information on the basis of your consent, whether express or implied.
- **Our contractual obligations to you:** Our handling of your information is to meet our contractual obligations to you, or to take steps at your request in anticipation of entering into a contract with you. Our contractual obligations to you may include the creation of your account and the provision of the Services to you.
- **Legitimate Business Interest:** We handle your information in order to provide you with Services and accomplish our legitimate business purposes.

International Transfer Of Data

For American Customers: We store and process your Personal Information on servers located in the United States of America for the purposes described in this Privacy Policy. If you are a resident of a country outside of the United States, you agree as a part of this Privacy Policy to the global transfer, process, and storage of your personal information.

For Canadian Customers: Some of our service providers that have access to your personal information are located outside of Canada. As a result, your personal information might be transferred, handled, stored, and or processed outside of Canada.

Do Not Track Policy

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. We currently do not respond to browser “do not track” signals.

Correcting/Updating Personal Information

We provide you with the opportunity to update, correct or erase your account, financial and credit card information on our website. You may review and update your contact information (name, address, and email address) by contacting our Support team via email (support@finicity.com), phone (801) 984-4200, or the chat function within the Services.

CONSUMER PRIVACY RIGHTS

The following states have implemented specific privacy-related rights for their residents. If you are a resident of one of these states, please click on your state below for more information:

For California Residents

Canadian Users

As our customer in Canada, you have choices and opportunities under Canadian law regarding the types of information we collect, how we collect it, who we might disclose it to, and why it might be shared. The information in this policy applies to these requirements as stated above. Furthermore, your personal information is maintained on our servers or those of our service providers and will be accessible by authorized employees, representatives and agents. You may request access to or correction of the personal information in our custody or control, or ask any questions about our personal information handling practices (including our use of service providers outside of Canada) by writing to our Privacy Officer at:

Finicity Headquarters:
434 West Ascension Way, Suite 200
Salt Lake City, UT 84123
(801) 984-4200

Children

You must be at least 18 years old to use our Services. We do not knowingly direct our Services to children or collect, use, or disclose information about legal minors who visit. If you use our Services, you represent that you are at least the age of majority under the laws of the jurisdiction of your place of residence. If you believe your child has provided us with personal information, please alert us at privacy@finicity.com. If we learn that we have collected personal information from a minor, we will promptly take steps to delete such information.

Retention Period

We will retain Personal Data for as long as necessary for the business or commercial reason it was obtained, or any ongoing retention requirements found in the law. The manner in which we review our retention requirements for our customers is (i) the length of time and type of service with our client and provide the Services; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Updates To This Privacy Policy

We may revise this Privacy Policy or our practices with respect to how we use personally identifiable information at any time at our sole discretion. If we make any material changes to how we treat our customers' personal information, we will notify you by email to the primary email address specified in your account, and through a notice on our website's home page. You are responsible for ensuring we have an up-to-date active email address to contact you. You are advised to review this Privacy Policy periodically for any changes. Your continued use of our websites after such modifications will constitute your acknowledgment of the modified Privacy Policy and your agreement to abide and be bound by the modified Policy. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Details

Questions regarding this Privacy Policy, our information practices or other aspects of privacy in connection with the use of our Services should be directed to our Data Privacy Officer, who can be reached by email at privacy@finicity.com.

Finicity Headquarters:
434 West Ascension Way, Suite 200
Salt Lake City, UT 84123
(801) 984-4200