

## Privacy Policy

This policy describes how Trio Financial Technologies Inc., doing business as 'Finch', collects, uses, and shares personal information. You can jump to particular topics by going to the headings below:

### Types Of Information We Collect.

### Use And Processing Of Information.

### Sharing Of Information.

### Your Choices.

### How We Protect Personal Information.

### Miscellaneous.

### Contact Information.

### Types Of Information We Collect.

The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Creation	We collect your name, email address, company name, date of birth, phone number, social security number and residential address when you create an account.	We have a legitimate interest in providing account related functionalities to our users. Accounts can be used to make payments and to save your preferences and transaction history.
Cookies and first party tracking	We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a web site is viewed. Our cookies collect your web browser type, IP address, language preference, referring site, and the time of each visit.	We have a legitimate interest in making our website operate efficiently.
Cookies and Third Party Tracking	We participate in behavior-based advertising. This means that a third party uses technology ( <i>e.g.</i> , a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites. Third party cookies collect your email address, IP address,	We have a legitimate interest in utilizing third party tracking and cookies.

	country code, technical data, website errors, and your actions on our site.	
Email Interconnectivity	If you receive email from us, we use certain tools (including clear .gifs) to capture data related to when you open our message and click on any links or banners it contains.	We have a legitimate interest in understanding how you interact with our communications to you.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services.
Transaction Data	When you initiate a transaction, we collect information to confirm and process it. This may include information about investment accounts held with third parties. This information may be shared with other third parties to facilitate the transaction.	We require this information in order to perform our contract with you.
Transaction Monitoring and Processing	In order to process a transaction, we will first need to collect information to verify your identity. This may include identity verification information from third parties, as well as your bank account information. We may also collect your email address and mobile phone number from third parties if you initiate or receive a transaction. We also collect information relating to the actions that you perform while logged into your account.	<p>We have a legitimate interest in the prevention, detection, and investigation of fraud, money laundering, criminal activity, and other misuse of our services. We may also have a legal obligation to collect this information or validate your identity for compliance with Anti-Money Laundering and other finance laws in the jurisdictions where we operate.</p> <p>We have a legitimate interest in confirming that you are an active Finch account holder and that you have initiated any transfer using your account.</p> <p>We also have a legitimate interest in creating a trustworthy, safe, and reliable platform.</p>

Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.
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In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, we may supplement our identity verification by comparing your information against a third-party database.

**Use And Processing Of Information.**

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites or use our application.
- To provide services, process transactions, or send notices about your transactions.
- To improve our services.
- To streamline the transaction process.
- To conduct analytics.
- To respond to inquiries related to support or other requests.
- To send marketing and promotional materials, including information relating to our services.
- To enforce our agreements with third parties, to resolve disputes, collect fees, and troubleshoot problems.
- For quality control and staff training.
- For internal administrative purposes, as well as to manage our relationships.
- To comply with our legal obligations.
- To enhance our security, to monitor and verify identity or service access, to combat spam or other malware or security risks, or to investigate potential violations of the law or our posted terms of use.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete a transaction we will collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your transaction. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

**Sharing Of Information.**

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** You may request that we validate your status as a Finch customer with a third party, and we will do so. We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy. For example, we may share your account information or other personal information about you with partner banks and brokerages in order to provide you with requested services.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third party intermediary.
4. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of transactions.

### **Your Choices.**

You can make the following choices regarding your personal information:

1. **Access To Your Personal Information.** You may request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you.
2. **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information contact us at the address described below.
3. **Deletion Of Your Personal Information.** Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of information, or request that we delete your personal information by contacting us at the address described below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.
4. **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below. For example, California residents may be entitled to object, or opt-out, of having their information sold to third parties.
5. **Automated Decision-Making.** We may use automated decision-making to decide whether we can provide services to you based on automated identity verification. If you

wish to have a human review the decision or otherwise object, you may do so by contacting us at the address described below.

6. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
7. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
8. **Revocation Of Consent.** If you revoke your consent for the processing of personal information then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.

### **How We Protect Personal Information.**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

### **Miscellaneous.**

The following additional information relates to our privacy practices:

- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy.
- **Information for California Residents.** California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are "sold" or transferred for an organization's "business purpose" as those terms are defined under California law. You can find a list of the categories of information that we share **here**. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below.

**Contact Information.** If you have any questions, comments, or complaints concerning our privacy practices please contact us at any of the following. We will attempt to respond to your requests and to provide you with additional privacy-related information.

support@finchmoney.com  
205 Portland Street, Suite 200  
Boston, MA 02114  
(732) 630-5020

If you are not satisfied with our response, you may have a right to lodge a complaint with your local supervisory authority.

**Last Revised:** \_\_\_\_\_

**Effective Date:** \_\_\_\_\_

\*\*\*\*\*Separate page to be linked from the Information for California Residents Section\*\*\*\*\*

### California Information Sharing Disclosure

California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicates that companies should disclose whether the following categories of information are collected, transferred for consideration, or transferred for an organization's "business purpose" as that term is defined under California law. Note that while a category may be marked that does not necessarily mean that we have information in that category about you. For example, while we use your bank account information to process transactions, we do not collect it from those browsing our website.

Category of Personal Information	Is information collected by us?	Is information transferred for valuable consideration?	Is information transferred for business purposes?
Audio, electronic, visual, thermal, olfactory, or similar information	✓	<input type="checkbox"/>	✓
Bank account number	✓	<input type="checkbox"/>	✓
Biometric information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Characteristics of protected classifications (e.g., age, sex, race, ethnicity, physical or mental handicap, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commercial information (e.g., products or services purchased, or other purchasing or consuming histories or tendencies)	✓	<input type="checkbox"/>	✓
Credit card number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Debit card number	✓	<input type="checkbox"/>	✓
Driver's License Number / State ID	✓	<input type="checkbox"/>	✓
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electronic network activity (e.g., browsing history)	✓	<input type="checkbox"/>	<input type="checkbox"/>
Email address	✓	<input type="checkbox"/>	✓

Employment	✓	<input type="checkbox"/>	✓
Employment history	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Geolocation data / GPS	✓	<input type="checkbox"/>	✓
Health insurance information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identifiers (e.g., name or alias)	✓	<input type="checkbox"/>	✓
Insurance Policy Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medical information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Online identifier (e.g. IP address – including location derived from IP address)	✓	<input type="checkbox"/>	✓
Other financial information	✓	<input type="checkbox"/>	✓
Passport Number	✓	<input type="checkbox"/>	✓
Physical Characteristics	✓	<input type="checkbox"/>	✓
Postal address	✓	<input type="checkbox"/>	✓
Signature	✓	<input type="checkbox"/>	✓
Social Security Number	✓	<input type="checkbox"/>	✓
Telephone Number	✓	<input type="checkbox"/>	✓
Transaction information	✓	<input type="checkbox"/>	✓