

# Privacy Policy

## Synapse Financial Technologies, Inc.

Effective as of September 9th, 2017.

Synapse takes your privacy seriously. Synapse does not share your information with third parties unless necessary to provide services to you (e.g. Bank, Investment Advisor, and the Platform website or phone application relaying our services to you). We do not sell your information to third parties for marketing purposes.

Terms not defined in the Privacy Policy are defined in our Terms of Service.

Below is our policy on your privacy:

### a. Information we collect includes:

Information you provide us: We collect nonpublic personal information you provide to us when you apply for a Deposit Account or an Investment Account or if you otherwise use Platform or our website or phone application services to send or receive funds. Additionally, when you communicate with Platform, Bank, or Synapse about these services, we may collect this information. While not all of this information is necessary to use our services, if you opt out of sharing some of this information, this may affect your ability to use your Deposit Account or Investment Account or other services offered by Platform, Bank, Investment Advisor, or Synapse.

The types of information we may collect include:

- **Consumer Identity Information:** your name or aliases, physical address, phone number, email address, date of birth, gender, social security number or other tax identification number, photo identification, selfie, or video authorization, or any other information you choose to provide;
- **Business Identity Information:** entity legal name or aliases / "doing business as" names, physical address, phone number, entity type, industry, organizational documents (e.g. articles of incorporation), employer identification number, or other information relating to your authorized signors or beneficial owners;
- **Bank Account Information:** account and routing details and your username, passwords, and any security questions and answers associated with your linked Bank Account(s); and

- **Investment Profile Information:** information relating to your financial goals and preferences, investment profile (risk appetite and investment time horizon), income range and sources, and other information we may request from you in order to comply with the applicable law for your Investment Account.
- **Other Information you provide to Customer Support, Bank, Investment Advisor, or Platform:** If you provide information to customer support, Platform or Bank, we may collect this information in order to provide services requested by you.

Information about your transactions: As you use your Deposit Account, Investment Account or otherwise send or receive funds through Platform's or Synapse's website or application, we collect nonpublic personal information in connection with each transaction, including transaction time, transaction amount and currency, and details relating to the sender or receiver of funds. We may also collect receipts, contracts, photos, memos or other information relating to your transactions.

Information from other sources: When you create a Deposit Account or Investment Account or otherwise send or receive funds through Platform's or Synapse's website or phone application services, we may collect information, including nonpublic personal information, about you from nonaffiliated third party service providers in order to verify your identity and to prevent fraud, and provide our services to you, including information relating to your location, phone number, email address, prior addresses and names, or information made available through a Bank Account you link to our services (e.g. account balances, transaction details, identity related information and your contact details associated with the account).

Additionally, we may collect information you share publicly on your social media accounts. If you do not wish to share this information publicly on your social media accounts, you should adjust your privacy settings with the site.

Information from your digital identity: Your access to Platform services, Bank Services and Synapse's services is primarily limited to your internet connected devices. As a result, we may collect some information relating to your digital identity such as:

- **Digital Identity Related Information:** IP address, your device "fingerprint" (e.g. hardware model, operating system and version, unique device identifiers and mobile network information), browser type, pages visited on our website and pages visited before visiting our website.
- **Cookies + Our Website:** If you visit our website, we use various technologies to collect information on our services and other websites, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that

help us improve our services and your experience, see which areas and features of our services are popular and count visits. While most web browsers are set to accept cookies by default, if you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our website or other services. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon.

#### **b. How we use your information**

We may use your information, including nonpublic personal information as follows:

- Provide, maintain and improve Deposit Account services, Investment Account services, and other services we offer you with Platform and Bank;
- Provide and deliver the products and services you request, process transactions and send you related information, including confirmations;
- Verify your identity and prevent fraud;
- Communicate between Platform, Bank, and Investment Advisor (as applicable) in order to provide services to you;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Monitor and analyze trends, usage and activities in connection with our services;
- Personalize and improve the services based on your usage;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected.

Synapse is based in the United States and the information we collect is governed by U.S. law. By accessing or using the services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

#### **c. How this information is shared**

We may disclose any information we collect about current and former customers, including nonpublic personal information, to affiliates and non-affiliated third parties as follows:

(1) With financial service providers, including (A) the Bank identified in your Deposit Agreement that provide banking services in connection with your Deposit Account with Bank; and (B) the Investment Advisor identified in your Investment Agreement that provide investment services in connection with your Investment Account;

(2) With non-financial companies, such as identity verification service providers and fraud prevention service providers that use the information to provide services to Synapse and other companies;

(3) With a non-affiliated third-party to access and transmit your personal and financial information from your linked Bank Account(s). You grant the third-party the right, power, and authority to access and transmit this information according to terms of their privacy policy and terms found [here](#) and [here](#);

(4) With other nonaffiliated companies for our everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations or report to credit bureaus. For example, in connection with our everyday business purposes, we may share information about you as follows:

- In response to a request for information, if we are required by, or we believe disclosure is in accordance with, any applicable law, regulation or legal process;
- With relevant law enforcement officials or other third parties, such as investigators or auditors, if we believe it is appropriate to investigate fraud;
- If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of Synapse or others;
- In connection with, or during negotiations of, any merger, sale of Synapse's assets, financing or acquisition of all or a portion of our business to another company; and
- With your consent or at your direction, including if we notify you that the information you provide will be shared in a particular manner and you provide such information.

We may also share aggregated or de-identified Information, which cannot reasonably be used to identify you. For example, we may share certain transaction details such as amounts and zip codes in a pseudo-anonymous fashion to promote security and validity of the transaction ledger and Synapse's services.

#### **d. Security**

Synapse takes commercially reasonable measures to help protect your User Data and other information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Additionally, we implement policies designed to protect the confidentiality and security of your nonpublic

personal information. Except as detailed herein as it relates to Bank, Investment Advisor, and Platform, Synapse limits access to your nonpublic personal information to employees that have a business reason to know such information, and implements security practices and procedures designed to protect the confidentiality and security of such information and prohibit unlawful disclosure of such information in accordance with its policies.