

## Privacy Policy

Last Updated March 26, 2024

This Privacy Policy (the “**Privacy Policy**”) describes how Prog Services, Inc., its affiliates, subsidiaries, agents, and assigns (collectively, “**Money App**”, “**we**”, “**us**”, or “**our**”) collect, use, and disclose user (“**you**” or “**your**”) information when you use our websites, including [money.app](#) (each, a “**Site**”), our mobile applications (each, an “**Application**”), and the products and services offered, operated, or made available by us through the Sites or the Applications (collectively, with the Sites and the Applications, the “**Services**”).

In addition to this Privacy Policy, SynapseFI (“**Synapse**”) is our backend software provider. Synapse’s API enables us to offer services and products to you (the “**Services**”). By using the Services and agreeing to this Agreement, you also agree that your information may be shared with Synapse and such sharing will be subject to Synapse’s [Privacy Policy](#).

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1. **What Information Do We Collect?** The types of “**Personal Information**” that we collect about you may include:
  - a. Identifiers such as your name, address, telephone number, email address, social security number, and online usernames and passwords for third-party sites and internet services;
  - b. Government-issues photo identification, such as a driver’s license or passport, photograph, proof of address documentation, and proof of identity documentation;
  - c. Financial information, account transaction history, account information about other linked bank accounts (such as transaction information and balances), and payment card information;
  - d. Occupation and other employment-related information;
  - e. “**Usage Information,**” including the hardware model, browser, and operating system that you are using, the URL or advertisement that referred you to the Services, all of the areas within the Services that you visit, how you interact with the Services, location information, and mobile network (if applicable), and your IP address or other unique device identifier (“**Device Information**”) for any computer, mobile phone, or other device that is used to access the Services.

Personal Information, Usage Information, and Device Information shall all be included in the definition of the term “**Information**” when it is used in this Privacy Policy.

2. **How Do We Collect Your Information?**
  - a. **From You.** We collect Information that you provide directly to us, both online and offline, in connection with an inquiry about the Services, an application to obtain the Services, or payments for the Services made to us. The Information collected from you will vary depending on the product or service requested.
  - b. **Other Sources.** We may obtain Information about you from our affiliates and credit bureaus. We may also use certain third parties to complete, validate, or verify Information that you have provided to us in order to assist you in your use of the Services, in order to supplement or validate information already provided by you, or in the prevention or identification of identity theft and fraud.
  - c. **Automatic Collection, Cookies, and Other Internet Technologies.** We also use cookies, web beacons, other standard internet technologies, and certain third parties to collect Information from you, from your device, and about your activities while using the Services. We may automatically collect Information from your browser when you use the Services. Information that you enter while using the Services may be collected even if you cancel or do not submit an application or form.
    - i. **Cookies.** A cookie is a small text file that is stored on your computer for record keeping purposes. When you use the Services, we may assign your computer one or more cookies to facilitate your access to the Services, personalize your online experience, maintain continuity during your online sessions, and record information about your visit. Cookies may also be used for anti-fraud and information security purposes, Through the use of a cookie, we also may automatically collect information about your online activity on the Services, such as

the web pages visited, the links or advertisements clicked on, and other actions taken while using the Services. We may use different kinds of cookies, including HTTP cookies (also known as browser cookies), Local Shared Objects such as Flash cookies, and other similar technologies, such as HTML5 local storage. Most browsers automatically accept cookies, but you can usually modify the browser setting to decline cookies. Flash Cookies, which by their nature are associated with Flash Player, may be removed by managing the settings with Adobe by visiting [www.adobe.com](http://www.adobe.com). If you choose to decline cookies, please note that some of the features of the Services may not function properly.

- ii. **Web Beacons.** Web beacons (also known as clear gifs, pixel tags, targeting and re-targeting pixels, third party pixels or web bugs) are small graphic images or other web programming code that may be included in our web pages and e-mail messages. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Services, to monitor how you navigate the Services, or to count how many e-mails that were sent were actually opened.
- iii. **Social Networks.** The Services may also include social network or other third-party plug-ins and widgets that may provide information to their associated social networks or third-parties about the Services that you use, even if you do not click on or otherwise interact with the plug-in or widget and regardless of whether you have an account or other relationship with these social networks and third parties. Information is transmitted from your browser and may include an identifier assigned by the social network or third-party, information about your browser type, operating system, device type, IP address and the URL of the web page where the plug-in or widget appears. If you use social network tools or visit social networking websites, you should read their privacy policies to learn what information they collect, use, and share.

### 3. **How Do We Use Your Information?**

- a. **Our Usage.** We may use your Information to: i) provide the Services; ii) process, review, determine eligibility, and approve or deny your application for the Services; iii) manage your customer relationship, respond to questions, and provide customer service; iv) recognize you across the Services; v) develop and display content and services tailored to your interests; vi) facilitate and complete transactions that you request; vii) communicate with you via email, telephone, postal mail, and/or your mobile device about the Services, our other products and services, and the products and services of our affiliates and third parties; viii) operate, evaluate, and improve our business and the Services, including to develop new products and services, to perform research, and for audit purposes; ix) analyze usage and performance of the Services and improve your experience and the experience of other users; x) enforce contractual obligations, verify your identity, and to help prevent or identify fraud, unauthorized or criminal activity, claims, and other liabilities; and xi) perform functions as described to you at the time of collection.

During the past 12 months, we have also disclosed the categories of personal information listed above for our business purposes. We have not, however, sold personal information to third parties. We will not sell your Personal Information, except in the event that all or a part of our business is merged, sold, or reorganized.

- b. **Job Applicants.** If your Information is submitted when applying for a position with us, the Information will be used solely in connection with considering and acting upon your application. We may retain your Information for a period of time, but only for the purpose of considering your application for current or future available positions or as required by law.

### 4. **With Whom Do We Share Your Information?**

- a. **Our Businesses.** We may share your Information with our affiliates and subsidiaries.
- b. **Service Providers.** We may share your Information with third party service providers who provide services to us or on our behalf, including Synapse, to assist in providing the Services and to help us understand your use of our products. Service providers include the categories listed in this section 4, along with shipping vendors, billing and refund vendors, payment card processors, Merchants, and other companies that help us operate and improve our products and services. Your Information may be stored and processed by our service providers in the United States or other locations where the service providers or we maintain facilities. Disclosure of your Information to service providers is not a sale, and we do not allow our service providers to use or share your Information for any purpose other than providing services on our behalf.
  - i. **Consumer and Credit Reporting Agencies.** We may provide your Information to consumer and/or credit reporting agencies and to third parties that provide identity verification and fraud detection.
  - ii. **Marketing.** We may share your Information with select third parties so that they can send you promotional materials about goods and services (including special offers and promotions) on our behalf.
  - iii. **Third-Party Advertising and Analytics Companies.** We may share your Information with network advertisers, ad agencies, and other advertising partners to serve our ads online. We may also use analytics providers to provide us with information regarding the use of the Services and the effectiveness of our advertisements. You may see ads while using the Services and those ads may be served by a third party. These third parties may set and access their own tracking technologies on your device (including cookies and web beacons), and they may otherwise collect or have access to Information about you. Some of these parties may collect Information over time when you use the Services or other online websites and services. We may share Information, including Information that has been de-identified, with third party advertising companies, analytics providers and other third parties, including for the purpose of serving you more relevant ads.

We may use a variety of companies to serve our advertisements. Some of these companies are members of the Network Advertising Initiative or the Digital Advertising Alliance Self-Regulatory Program for Online Behavioral Advertising and you may want to visit the following webpages, which provide “opt-out” mechanisms for participating companies: [http://networkadvertising.org/managing/opt\\_out.asp](http://networkadvertising.org/managing/opt_out.asp);

<http://www.aboutads.info/choices/>. You may also be able to opt-out from certain interest-based advertising through your mobile device settings or as described below in the Section titled “What Are Your Options Regarding Your Information.” Please note opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while online.

- c. **Other Situations.** In addition to other sharing described in this section, we may also disclose your Information at our sole discretion: (i) in order to comply with laws or legal processes, including subpoenas or agency orders and investigations under appropriate circumstances; (ii) as we reasonably determine necessary or appropriate to protect property, our rights, or the rights of others; and (iii) to enforce our contracts, policies, and customer agreements. We may also transfer Information covered by this Privacy Policy, including Personal Information, in connection with a merger, sale, or acquisition (including transfers made as part of insolvency or bankruptcy proceedings) of all or part of our business or as part of a corporate reorganization, stock sale, or other change in control.
5. **How Do We Protect Your Information?** We maintain administrative, technical, and physical safeguards intended to protect against the loss, misuse, unauthorized access, and disclosure of Information, including your social security number. Although we take such precautions seriously, it is impossible for us to guarantee the safety and security of your Information. Our policies prohibit the unlawful disclosure of Personal Information. We share Personal Information externally only where federal and state law allows or requires it. Internally, it’s our policy to limit the access, use, and disclosure of Personal Information to be in line with the job duties of our associates, as well as applicable law. Please note that we do not ensure or warrant the security of any Information that we collect, and you use the Services and provide us with your Information at your own risk.
  6. **What Are Your Options Regarding Your Information?**
    - a. **Accessing and Correcting Personal Information.** You may request to access or update the Personal Information that we hold about you. You can access or update your Personal Information in the following ways:
      - i. If you have created an account on the Services, you will be able to update your own contact and payment information, subject to certain limitations.
      - ii. Contact us through one of the methods listed in the “How Can You Contact Us?” section within this Privacy Policy. Please include your current contact information, the information that you are interested in accessing, and your requested changes. After authenticating your request, we will provide you with the Personal Information that you requested or make your requested changes if i) the information is reasonably available; ii) the information does not infringe on the privacy of other individuals, and iii) the disclosure or changing of the information is not otherwise prohibited by law or our internal policies or procedures. For all requests, we will reasonably describe the types of Personal Information that we generally collect, how it is used, and with whom it is shared.
    - b. **Communications.** You may elect to opt-out of email and text communications from us by following the instructions provided in such communications or by contacting us as described in this Privacy Policy. Even after opting out, you may still receive service oriented, non-promotional communications from us and promotional communications from other third parties as a result of their own interactions or transactions with you. Please allow time for us to process requests. You should contact us should there be any concerns about your opt-out request.
    - c. **Targeted Advertising.** You may opt-out from many third parties who serve online advertising, including some who serve ads on the Services and elsewhere online, by visiting [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp); or <http://www.aboutads.info/choices/>. Opting out does not mean you will not see any ads when using the Services, but the ads that you see will no longer be customized to you based on your profile or interactions with us.
    - d. **“Do-Not-Track.”** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services that you visit. Like many websites and online services, we do not alter our practices when we receive a “Do Not Track” signal from your browser. To find out more about “Do Not Track,” please visit [www.allaboutdnt.com](http://www.allaboutdnt.com).
  7. **How Can You Contact Us?** If you wish to contact us regarding your Information, this Privacy Policy, to designate a third party who may communicate with us on your behalf, or to request to access, change, or delete your Personal Information, you may contact us as described below. If you choose to contact us via email or writing, please provide sufficient contact information to allow us to contact you. If you choose to contact us, we will verify your identity using an appropriate method of verification based on the type of request. These methods may include one or more of the following: email address verification, proof of residency displaying your name and principal residence address, or proof of identity using government issued identification.

**Email:** [privacy@money.app](mailto:privacy@money.app)

**Write:** Prog Services, Inc., 256 W Data Drive, Draper, UT 84020
  8. **Will This Privacy Policy Change?** This Privacy Policy may be updated periodically to reflect relevant changes in our information practices. We will notify you of material changes by posting the changed or modified Privacy Policy via the Services. We may also provide notice to you in other ways in our discretion, such as through contact information that you have provided. Any changes to this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy unless otherwise specified, and your continued use of the any of the Services after the effective date of the revised Privacy Policy will constitute your consent to those changes. You may be required to consent to our new policies in order to continue to use the Services.

9. **Third Party Content and Sites.** The Services may contain content, services, advertising and other materials that link to websites operated by third parties. We have no control over those other websites, and this Privacy Policy does not apply to them. You should refer to the privacy policies of those websites.
10. **California Privacy Rights.** If you are a California resident, you may ask us to refrain from sharing Personal Information with third parties for their own direct marketing purposes. You must indicate your preference by contacting us as described above. It may take us up to thirty (30) days to fully process a request.
- California residents also have the right to access their information, the right to request deletion, and the right to know what information we disclose to third parties for business purposes. Requests for access, deletion, and to know what we share with others should be submitted as described in the “What Are Your Options Regarding Your Information?” and “How Can You Contact Us” sections.
- We will not discriminate against California residents who exercise their rights under this section.
11. **Children's Online Privacy Policy.** The Services are not directed to children under the age of 13, and we do not knowingly collect, disclose, or sell Information from children under the age of 13 through the Services.

FEDERAL PRIVACY NOTICE

Rev. 12/21

FACTS	WHAT DOES PROG SERVICES, INC. DO WITH YOUR PERSONAL INFORMATION?
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?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>- Social Security number</li> <li>- Employment information and income</li> <li>- Account balances, account transactions, and transaction history</li> <li>- Checking account information</li> </ul>
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 Prog Services, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Prog Services, Inc. share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don’t share

To limit our sharing	<ul style="list-style-type: none"> <li>Email us at <a href="mailto:privacy@money.app">privacy@money.app</a></li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your <b>information 30 days</b> from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Email us at <a href="mailto:privacy@money.app">privacy@money.app</a>

Who we are	
<b>Who is providing this notice?</b>	This notice is provided by Prog Services, Inc.
What we do	
<b>How does Prog Services, Inc. protect my personal information?</b>	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.
<b>How does Prog Services, Inc. collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>Apply for services or open an account</li> <li>Provide account information or pay your bills</li> <li>use your credit or debit card</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <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 on your rights under state law.</p>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li><i>Our affiliates include PROG Holdings, Inc., Prog Leasing, LLC, Vive Financial LLC, Four Technologies Inc., PRG Ventures, Inc., PRGB, Inc., and AM2 Enterprises, LLC.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li><i>Prog Services, Inc. does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li><i>Nonaffiliates we share with may include other financial institutions, financial services companies, strategic partners, and other entities through which we offer products.</i></li> </ul>
Other important information	

## Special Notice For State Residents

For California Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing-without your authorization. We will also limit our sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.

For Nevada Customers: We are providing you this notice pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call List by writing to us at 256 W Data Drive, Draper, UT 84020. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protections, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101, phone number (702) 486-3132, email BCPINFO@ag.state.nv.us.

For Vermont Customers. We will not share personal information with affiliates or nonaffiliates except as permitted by Vermont law, such as to process your transaction or with your consent.

