

This Privacy Policy describes the policy for collection, use, sharing, and protection of your information ("Information") collected from you by Spentra, LLC ("we," "us," "our," "Spentra") through our technology services, including without limitation our mobile application (the "App"), our website (spentra.com), and our Money Earned® feature, (collectively, the "Services"), and from your employer.

If you are a Spentra Mastercard® Payroll Card (the "Card") cardholder, or become one, then the issuing bank's Privacy Policy will also apply to you. This Privacy Policy does not modify the Cardholder Agreement governing the use of the Card. This Privacy Policy does not modify the issuing bank's privacy practices, which apply to how information connected to the Card is used.

What Information Do We Collect?

We may collect both personal and non-personal information from you.

"Personal information" means information you provide that could reasonably be used to contact you, to identify you personally, or that otherwise relates to you. We typically collect such information by requesting you complete an online application or register for an online account or through your employer as described below. When we use the term "non-personal information," we mean general, non-personal, statistical, or technical information not associated with your name.

Information Collected From Your Employer

We may collect the following information about you directly from your subscribing employer, including without limitation:

- First and last name
- Employee number
- Social Security number (SSN)*
- Date of birth
- Mailing address
- Net hourly wage
- Hours worked
- PTO hours

Information Collected From You

When you use the Services, we may collect the following information from you, including without limitation:

- Cell phone number
- Email address
- Mailing address
- Social Security number (SSN)*
- Information for any third-party services

**Social Security number is collected only during account setup and while requesting the Card. This information is electronically transmitted to the card processor for card processing by establishing an encrypted link using SSL (Secure Sockets Layer). Only the last four digits of the SSN are retained by us for security and validation purposes.*

We may use the following technologies to collect Information:

- **Cookies.** Cookies are small text files stored on your computer or equipment when you visit certain online pages that record your preferences and identify you as a unique user. We may use cookies on our website to allow us to measure activity and to personalize your experience. Cookies may also allow us to track your status or progress when requesting products, services, or information. Most web browsers automatically accept cookies. If you prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject any cookies. Please be aware if you disable or reject cookies, some features of the website may not function properly or may be slower.
- **Web Beacons.** A web beacon is an electronic file on a web page or email that allows us to count and recognize users who have visited that page. Like cookies, web beacons allow us to summarize overall usage patterns for our analysis and provide personalized services to you. You can generally avoid web beacons in email by turning off HTML display and displaying only the text portion of your email.
- **Internet Protocol (IP) Address.** An IP address is a unique number automatically assigned to your computer whenever you connect to the Internet. These IP addresses identify each sender or receiver of information sent in packets across the Internet. As you enter our website, we capture and retain the IP address of the device you are using, such as a personal computer or a mobile device.

- Location and Usage Information. If you use our mobile application or access the website using a mobile device, we may collect information concerning your location, when a mobile application is launched, individual session lengths, or why a mobile application may not be working.

How Is Your Information Used?

Your Information is used to personalize your experience and help us to better respond to your individual needs, to improve our website, to improve customer service and more effectively respond to your customer service requests and support needs, to provide system notification, and to administer site features. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever without your consent, other than as set out in this Privacy Policy.

We may use your Information to:

- Verify the status of your eligibility for our Services, including continuing employment with your subscribing employer and availability of your earned but unpaid wages;
- Improve customer service by responding to your inquiries about our Services, such as a request to reset your password;
- Fulfill your request for our Services and third-party services;
- Offer you other services we believe may be of interest to you; and
- Personalize our Services, such as providing you the history of your transactions or prefilling form fields for the various Services within the App for your convenience.

How Is Your Information Shared?

Your Information will not be sold, exchanged, transferred, or given to anyone for any reason whatsoever without your consent; however, we may disclose your Information:

- To third parties approved by us as service providers for fulfillment of your request for our Services and for third-party services. Such third parties shall not have an independent use of the Information we disclose to them and shall adhere to the rules set forth in this Privacy Policy.
- To respond as required by law such as to comply with a subpoena or similar legal process, respond to a government request, or as otherwise required by law;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate suspected fraud.

How Can You Make Changes to Your Information?

You may correct certain Information via your user account, if allowed. For changes to your Information not allowed via your user account, you will need to contact your employer and/or card processor (as applicable) and send an email that includes your contact information to support@spentra.com. You may choose not to use our Services, but even after you stop using the Services, we may retain archived copies of Information about you for a period of time consistent with applicable law.

How Do We Protect Your Information?

We are committed to safeguarding the confidentiality of your Information. We provide physical, electronic, and procedural safeguards to protect your Information such as password-protected systems, SSL technology to ensure your Information is fully encrypted and transferred securely, and active monitoring of our technology assets for protection from intrusion and external vulnerabilities. We limit access to Information to authorized employees and contractors who need to know that Information in order to fulfill your request for our Services.

Privacy Policy Changes

This Privacy Policy may be updated from time to time for any reason. Any changes to the Privacy Policy shall be posted in the App. You are advised to consult this Privacy Policy regularly for any changes. Your continued use of the Services following any such change constitutes your acceptance of and your agreement to be bound by the Privacy Policy as modified. The "Last Updated" date of this Privacy Policy will indicate when the change became effective. Changes to this Privacy Policy shall apply only to Information collected after the date of such change.

Children

We do not knowingly collect, use, or disclose personal information from children under the age of 13 on the site. This site is not directed to children under 13. If you are under the age of 13, please do not provide any personal information to us. If we become aware we have collected personal information from a child under the age of 13, we will make commercially reasonable efforts to delete such information from our database.

Limitation

We are committed to protecting your Information and endeavor to provide reasonable security for it. However, no security system can prevent all potential security breaches and some privacy issues may be unintentionally missed. Spentra cannot guarantee error-free performance and is

not responsible for any damages (including incidental, consequential, or punitive damages) relating to the practices described in this Privacy Policy. The Spentra Services are operated in accordance with the laws of the United States and are intended for the use of only residents of the United States.

Your Consent

By using the Services, you are consenting to and agreeing to be bound by this Privacy Policy, now and as amended by us from time to time.

Contact us

If you have any questions or concerns regarding this Privacy Policy, please contact us via email at support@spentra.com.