



KREDIT FINANCIAL INC.

## PRIVACY POLICY

Last Updated April 28, 2023

Welcome to the website (the “Site”) of Kredit Financial Inc. (“Kredit,” “we,” “us,” or “our”). Kredit provides a platform designed to facilitate communications between consumers and financial institutions in their personal financial network and empower consumers to make personal financial decisions (collectively, including the Site and any mobile applications and related products and services, the “Service”). Kredit follows this privacy policy according to the applicable law in the places in which we operate. We also work collaboratively with other internet and computer and mobile applications which frequently have their own privacy statements and policies and we encourage you to review them. Please know that our site and applications may contain links to other sites we do not own or control but that you may find useful. Kredit is not responsible for the privacy practices of those sites.

Please note that we may use third party language models in our chat platform to provide conversational features to our users. When you interact or query our chat platform for instructional, general business, or contact information to help you navigate our Service, the text of your messages may be transmitted to these language models to generate desired responses and we may maintain session logs pertaining to user activity. As provided in chat platform instructions, we do not intend to send user financial or personal data to the language models and request users do not attempt to submit any such information. However, users are solely responsible for the content of any message sent through that channel. We may unilaterally modify and adjust the parameters of the language model’s functionality to better ensure accurate responses for our users. User understands that Artificial Intelligence and machine learning are rapidly evolving fields of study. Given the nature of this emerging technology, the output may in some situations result in incorrect results and information does not accurately reflect real people, places, or facts. You should evaluate the accuracy of any output from the chat platform as appropriate for your use case.

This Privacy Policy gives you an overview of personal data we collect, the purpose for processing that information, how and why that information may be shared, and other privacy topics that relate to your personal data. In this Policy we summarize your choices concerning our data practices. It also explains how we [engage with Plaid](#) to provide the Service to you.

**We do not, and without your consent will not sell, lease, or rent your information to third parties for monetary or other valuable consideration. You may exercise your right to be forgotten at any time by contacting us here [privacy@trykredit.com](mailto:privacy@trykredit.com).**

Before using the Service or submitting any personal data to us, please review this Privacy Policy carefully and [contact us](#) if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy or are not over the age of thirteen, you may not access or use the Service.

### 1. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect categories of personal data and information, the general purposes of which, include these (we sometimes refer to the personal data and information we collect as “Personal Data”):

**Personal Data You Provide:** Generally, this data or information establishes your account, method/means of identifying institutions in your personal financial network, and potentially also your methods and means of payment, services and other data related to our relationship with you.

You may share this Personal Data when you visit the Site, register to use the Service, in connection with your use of the Service, and in other instances where you may provide it to us. The Personal Data collected during these interactions may vary based on what you choose to share with us and generally will fall into the categories described below.

**User Data.** It includes but may not be limited to this information:

- your name, email address, mobile phone number, and physical address,
- as well as the financial information and other Personal Data you provide us or enable us to access through third parties (discussed further [below](#)),
- certain banking and financial information in connection with any Services fees, including as necessary to assure payments can be processed by our third-party payment processors,
- And personal identifiers you may have such as your social security number and/or state/governmental identifiers, driver's license numbers or other government issued identification numbers, date of birth, age, gender, and other personal details you choose to share with us that may be necessary to verify your identity and/or provide other services unique to you and your preferences.

**Administrative Data.** This information may include device and system information, product license information, and/or usage and preference information including how you want us to communicate with you. This data helps us to understand and best serve your expectations, needs, interests and requirements.

**Security Data.** This data may include specifics about your financial accounts or transactions, location data and other information you provide to organize your personal financial network.

**Diagnostic Information.** If and as you use our Services and platform we may capture and preserve application crash reports, information you share regarding your customer experience as necessary to troubleshoot any malfunctioning Services. For example, when you call, in message, chat, email, or otherwise communicate with us, we may retain and review recordings and records and the contents of the communications as required or permitted by law and our recording and information management policies.

**Data We Receive Automatically From Your Use of the Service:** When you visit, use or interact with the Service, we may receive certain information about your visit, use or interactions. For example, we may monitor the number of people that visit the Service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the Service (e.g., Google Chrome, Microsoft Internet Explorer, etc.), and geographical location information. In particular, the following information may be created and automatically logged in our systems:

- **Log data:** Information that your browser automatically sends whenever you visit the Service ("log data"). Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interacted with the Service.
- **Cookies:** Please see the "[Cookies](#)" section below to learn more about how we use cookies.
- **Device information:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Information:** We collect information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency and duration of your activities.

**Cookies:** We use cookies to operate and administer our Service, gather usage data on our Service and improve your experience on it. A "cookie" is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it) and help recognize your

computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit [All About Cookies](#).

**Analytics:** We may use certain third-party analytics providers, including Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help us analyze how users use the Service and enhance your experience when you use the Service. For more information on how Google uses this data, go to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

**Online Tracking and Do Not Track Signals:** We and our third-party service providers, including Facebook, may use cookies, pixels or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Service and use that information to send targeted advertisements. Our Service currently does not respond to “Do Not Track” (“DNT”) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do respond to DNT signals in the future, we will update this Privacy Policy to describe how we do so.

**Your Choices:** On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off or otherwise manage them. Kredit has no control over your choice of browser or the policies and practices of the browser companies. Please assure you review any browser companies’ own policies and procedures. For your convenience here are links to a number of browser companies where you can review the policies and procedures each has:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Service and the choices you make about setting cookies may have an impact on the scope of functions associated with features of the Service you are able to access.

As articulated above, any User Content provided through the chat platform may interact with third party language models and you are solely responsible for the content of any message you send through that channel.

Advertising networks unrelated in any way to Kredit may collect Personal Data through the use of cookies. Should you desire to opt in or out of advertising preferences, review the unique privacy policies and procedures of your browser or website or the Network Advertising Initiative’s online resources at <http://www.networkadvertising.org>. You will be able to review opt-in and opt-out instructions there as well as other information about those unrelated sites and networks’ privacy statements. Kredit has no relationship of any sort to any of these sites or resources and notes them here solely for your convenience.

If you access the Service on your mobile device, the configuration of the applications or technology on your mobile device may, through no control of Kredit, limit your opportunities to control tracking, advertising, or other settings.

## 2. HOW WE USE PERSONAL DATA

Consistent with applicable law and choices and controls that may be available to you, we may use all or some of the Personal Data we collect from you or from devices associated with you, for purposes including the following:

- To personalize content and your experience;
- To provide and facilitate your engagement with the Service, including to verify your identity, facilitate communications and payments between you and third-party financial institutions via our platform, and obtain your credit report from a third-party upon your request;
- To respond to your inquiries, comments, feedback, or questions;
- To send administrative information to you, for example, information regarding the Service, and changes to our terms, conditions, and policies;
- To send you offers and promotions for our products and Services or third-party products and services;
- To analyze how you interact with our Service;
- To maintain and improve the content and functionality of the Service and to troubleshoot any issues you or other users may report to us;
- To develop new products and services;
- To prevent fraud, criminal activity, or misuse of our Service, and to assure the security of our IT systems, architecture and networks; and
- To comply with our legal obligations and legal process and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or other third parties.

**Aggregated or Anonymized Information.** We may collect or generate aggregated and/or anonymized Personal Data and use the aggregated and/or anonymized information to analyze the effectiveness of our Service, to improve and add features to our Service, and for any other lawful purpose. In addition, we may share aggregated and/or anonymized information with our business partners and other third parties. We may collect or generate aggregated and/or anonymized information through the Service, through cookies, and through other means described in this Privacy Policy.

**Marketing.** By providing your contact information to us you are giving us permission to use your Personal Data to contact you to tell you about products or services we believe may be of interest to you. For instance, if you elect to provide your email or telephone number, we may use that information to send you special offers. You may opt out of receiving marketing emails at any time by following the instructions contained in each promotional email we send you. You can also change your permissions regarding marketing emails and/or text messages you receive by updating your settings through your account. In addition, if at any time you do not wish to receive future marketing communications, you may [contact us](#). If you unsubscribe from our marketing lists you will no longer receive marketing communications, but we will continue to contact you regarding management of your account, other administrative matters, and to respond to your requests. Please understand that any changes in your communication preferences will take effect prospectively and will be processed within a reasonable timeframe after you contact us to notify us regarding a change.

## 3. SHARING AND DISCLOSURE OF PERSONAL DATA

Our platform is designed to facilitate communications between you and financial institutions you tell us about that are in your personal financial network. Accordingly, we will share your Personal Data with those financial institutions in accordance with your use of our Service, including to facilitate payments from you to such financial institutions. In certain circumstances we may share your Personal Data with third parties, subject to applicable laws, as set forth below:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers we contract with or coordinate with, including providers of hosting services, cloud services and other information technology services providers, event management services, email communication software and email newsletter services, advertising and marketing services, payment processors, and banking,

credit or financial service providers, customer relationship management and customer support services, and web analytics services (for more details on the third parties that place cookies through the Service, please see the “[Cookies](#)” section above). Pursuant to our instructions, these parties will access, process or store Personal Data in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the [security standards](#) we apply to your Personal Data.

- **Companies You Select:** If you direct us to share your Personal Data with another company, by electing to share your personal information with others to fulfill your request, we will share your Personal Data and once shared it will be subject to the privacy policies and practices of those other companies.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider, your Personal Data and other information may be shared in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.
- **Legal Requirements:** If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the Service, or the public, or (v) protect against legal liability.
- **Affiliates:** We may share Personal Data with our affiliates, meaning an entity that controls, is controlled by, or is under common control with Kredit. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.

#### 4. DATA RETENTION, STORAGE AND PROCESSING.

We keep Personal Data for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is longer. Whenever your Personal Data is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. These steps may include implementing standard contractual clauses with third parties, encouraging you to review the privacy statement of other companies you direct us to share your information with, and if required by law, obtaining your consent or other lawful approval of transferring your information.

#### 5. UPDATE YOUR INFORMATION

Please log in to your account or [contact us](#) if you need to change or correct your Personal Data.

#### 6. CHILDREN

Our Service is not directed to children who are under the age of 18. Kredit does not knowingly collect Personal Data from children under the age of 18. If you have reason to believe that a child under the age of 18 has provided Personal Data to us through the Service please [contact us](#) and we will endeavor to delete that information from our databases.

#### 7. LINKS TO OTHER WEBSITES AND THIRD-PARTY FUNCTIONALITY

The Service may contain links to other websites or applications, or other functionality or integrations not operated or controlled by Kredit, including certain banking or financial services (“**Third-Party Services**”). You will generally have discretion and control over the Third-Party Services with whom you elect to interact and share your Personal Data, except as otherwise provided in this Privacy Policy. These Third-Party Services include certain API finance solutions, such as Plaid Technologies, Inc. (“**Plaid**”). The information that you share with Third-Party Services will be governed by the specific privacy policies and terms of service of the Third-Party Services and not by this Privacy Policy. By providing these links we do not endorse their policies or practices, are not recommending them to you, nor have we reviewed these Third-Party services. Please contact the Third-Party Services directly for information on their privacy practices and policies. Should you

believe you have concerns with the actions or inactions of Third-Party Services we encourage you to report your concerns directly to those Third-Party Services.

In connection with our Service, we use Plaid to gather your data from financial institutions. The Personal Data to which you may provide us access via Plaid includes for example, contact information, account information, and payments activity. By using the Service, you grant us and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#).

In addition, and as articulated above, and User Content provided through the chat platform may also interact with third party language models and you are solely responsible for the content of any message you send through that channel.

## **8. SECURITY**

You use the Service at your own risk. We implement reasonable technical, administrative, and organizational measures designed to protect Personal Data both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or e-mail. Please keep this in mind when disclosing any Personal Data to Kredit via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third-party websites.

## **9. YOUR CHOICES**

In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to use some features of our Service, those features of our Services may be unavailable to you. You can also [contact us](#) to ask us any questions, make recommendations, or to seek assistance in updating or correcting your Personal Data.

## **10. CHANGES TO THE PRIVACY POLICY**

The Service, and our business may change from time to time. As a result, we may change this Privacy Policy at any time. When we do, we will post an updated version on this page noting the revision date, unless another type of notice is required by the applicable law. Your continued use of our Service, including by way of example but not limitation, providing us with Personal Data after we post an update Privacy Policy, or notified you by other means if applicable, shall be regarded as your consent to revisions to our Privacy Policy and practices related to it.

## **11. CONTACT US**

If you have any questions about our Privacy Policy or information practices, please contact us at [privacy@trykredit.com](mailto:privacy@trykredit.com).

## **12. CALIFORNIA RESIDENTS' RIGHTS**

Notice to California Residents: If you are a California resident, you may have certain additional privacy rights that are described in more detail here [<https://www.trykredit.com/ccpa>].