



## **END USER PRIVACY POLICY**

*Effective Date: April 21, 2023*

**Link Financial Technologies, Inc. (“Link Money”) takes privacy and security very seriously. We do not sell or rent your personal information to third parties. We do not and will not have access to your bank login information or credentials that you use to link your account.**

This End User Privacy Policy (“Policy”) is meant to help you (the “end user”) understand how we at Link Money collect, use, and share the end user information in our possession to operate, improve, develop, and protect our services, and as otherwise outlined in this Policy. This Policy applies to Link Money and any of its affiliates (collectively, “Link Money”, “we”, “our”, and “us”).

If you utilize the services provided by Link Money, we will process information that we collect from or about you in accordance with our **U.S. Consumer Privacy Notice**.

**IF YOU ARE LOCATED OUTSIDE THE UNITED STATES, OR IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO USE THE LINK PLATFORM.**

### **Background**

#### ***About Link Money***

Our mission at Link Money is to provide merchants and their customers with an easy, reliable, secure and inexpensive way to make payments using open banking infrastructure.

#### ***About this Policy***

This Policy’s goal is to provide a straightforward explanation of what information Link Money collects from and about end users (“End User Information”), and how we use and share that information. We value transparency and want to provide you with a clear and concise description of how we treat your End User Information.

Please note that this Policy only covers the information that Link Money collects, uses, and shares. This Policy does not cover any websites, products, or services provided by others. In providing our services, we work with several data access network partners, including Akoya LLC and Finicity Corp. (the “DANs”) and our payments service provider Dwolla, Inc. By



accepting this Policy, you also accept Dwolla's Privacy Policy at:  
<https://www.dwolla.com/legal/privacy/#legal-content>

## Data Practices

### *Information We Collect and How We Collect It*

As explained in greater detail below, Link Money collects certain account information, routing details, transactional data, personal information, and other types of End User Information in order to provide our services.

**Information you provide.** When you connect your financial account through Link Money, where applicable, we will collect certain **identifiers**, such as your name, email, address, session information, and other information that will help us facilitate the transaction. When providing this information, you give Link Money the authority to act on your behalf to access and transmit your End User Information from the relevant bank or other entity that provides your financial accounts (your "Financial Institution") to arrange payment(s). We do not and will not have access to your bank login information/credentials that you use to link your account. If you use FIDO/passwordless authentication to connect your account via Link Money, we will receive binary data for the public key pair to enable that authentication. We will not have access to your private key, nor do we receive any of your biometric information.

**Information we receive from your financial accounts.** The information we receive from the Financial Institutions that maintain your financial accounts varies depending on a number of factors, including the specific Link Money services that you use, as well as the information made available by the Financial Institutions and/or DANs. But, in general, we collect the following types of identifiers, commercial information, and other personal information from your Financial Institutions through the DANs:

- **Customer records information**, including financial institution name, account name, account type, account ownership, account number and routing number.
- **Commercial information**, including your current and available balance as well as historical transaction/balance data going back at least 6 months. The transactional data we process includes transaction amounts, dates, payee, types, price, and a description of the transaction.
- **Identifiers**, including information including an account owner(s) name, email address, phone number, and address information.

The data collected from your financial accounts can potentially include information from all accounts (e.g., checking and savings) accessible through our DANs.



**Information we receive from your devices.** When you use our services to pay a merchant using your bank account, we may receive **identifiers** and **electronic network activity information** about the device you use, including internet protocol (IP) address, location information, operating system, features within our services you access, browser data, unique device identifiers and other technical information about the device. We also use cookies/analytics tags or similar tracking technologies to collect usage statistics and to help us provide and improve our services.

**Information we receive about you from other sources.** We also may receive **identifiers** and commercial information about you directly from the relevant merchant or potentially other third parties. For example, merchants may provide information such as your full name, email address, phone number, or information about your transaction, including item(s) bought.

**Inferences we derive from the data we collect.** We may use the information we collect about you to derive inferences about your transactions. For example, we may infer the likelihood of each transaction being successfully completed. Inferences will never be made based on an individual's protected characteristics.

### *How We Use Your Information*

We use your End User Information for a number of business and commercial purposes, including to operate, improve, and protect the services we provide, and to develop new services. We may collect and use End User Information in an aggregated, de-identified, or anonymized manner (that does not identify you personally) for any purpose permitted under applicable law. This includes creating or using aggregated, de-identified, or anonymized data based on the collected information to develop new services and to facilitate research. More specifically, we may use your End User Information:

- To operate, provide, and maintain our services;
- To verify your account(s) with your Financial Institution(s);
- If you use our services to link your account(s) for payment purposes, to help facilitate the initial payment and any subsequent payments;
- To improve, enhance, modify, add to, and further develop our existing services, including analyzing usage, performing end-user risk modeling, and for research and development;
- To protect you, merchants, our partners, Link Money, and others from fraud, malicious activity, and other privacy and security-related concerns;
- To develop new services;
- To provide customer support to you or to merchants, including to help respond to your inquiries related to our service or merchants' applications;
- To investigate any misuse of our service or merchants' applications, including violations of our merchants' respective policies, criminal activity, or other unauthorized access to our services;
- To comply with contractual and legal obligations under applicable law; and



- For other notified purposes with your consent.

### ***How We Share Your Information***

We are committed to maintaining your trust, and we want you to understand when and with whom we may share information about you. We may share your End User Information in the instances described below.

- If you are using Link Money to make payments to merchants, we will share with the relevant merchant the name of your bank, the bank's routing number, the last four digits of your account number, your account type (checking), and the transaction status;
- If you are using Link Money to verify your account at a Financial Institution, we will share with the relevant merchant the name of your bank, your account type (checking), your account number and the bank's routing number;
- To enforce any contract with you;
- With your connected Financial Institutions to help establish or maintain a connection you've chosen to make;
- If we believe in good faith that such disclosure is appropriate, to comply with applicable laws, regulations, or legal processes (such as a court order or subpoena);
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
- Between and among Link Money and our current and future parents, affiliates, subsidiaries and other companies under common control or ownership;
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of you, merchants, our partners, Link Money, and others, including with fraud prevention vendor(s); or
- For any other notified purpose with your consent.

We do not sell or rent the personal information that we collect.

### ***Transfer of End User Information***

We will never transfer End User Information outside of the United States.

### ***Retention Practices***

We retain and use End User Information for no longer than necessary to fulfill the purposes for which it was collected and used, as described in this Policy, unless a longer retention period is required or permitted under applicable law. We will retain and use End User Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. As permitted under applicable law, even after you stop using the application or



terminate your account with one or more merchants, we may still retain your information (for example, if you still have an account with another merchant). We may also retain some or a part of your information in an aggregated, de-identified and anonymized format - data which is not directly attributable to you - for research and development purposes. However, your information will only be processed as required by law or in accordance with this Policy.

You can contact us about our data retention practices using the contact information below.

## **Additional Provisions**

### ***Cookie Usage***

We may use cookies on your computer in order to collect certain aggregate data about our users, and to customize certain aspects of your specific user experience. A cookie is a small data text file which is stored on your computer that uniquely identifies your browser. Cookies may also include more personalized information, such as your IP address, browser type, the server your computer is logged onto, the area code and zip code associated with your server, and your first name to welcome you back to our Site.

We may also use cookies to perform tasks such as: monitoring aggregate site usage metrics, storing and remembering your passwords (if you allow us to do so), storing account and advertising preferences that you have set, and personalizing the services we make available to you.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all future cookies or to indicate when a cookie is being sent. However, some aspects of the Site may not function properly if you elect to disable cookies.

### ***Do Not Track***

Currently we do not take any action when we receive a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit [www.donottrack.us](http://www.donottrack.us).

### ***Changes To This Policy***

We may update or change this Policy from time to time, and when we update it, we will revise the "Effective Date" above and post the new Policy on our website, and in some cases, we may provide additional notice. To stay informed of our privacy practices, we recommend you review the Policy on our website on a regular basis as you continue to use our services.



### *Children*

We do not knowingly collect or maintain personal information from any person under the age of sixteen. No parts of our platform are directed to or designed to attract anyone under the age of sixteen.

### *Contacting Link Money*

If you have questions or complaints about this Policy, or about our privacy practices generally, you can contact us at [privacy@link.money](mailto:privacy@link.money).