

Privacy Policy

At Vantar, protecting your privacy and ensuring transparency in how we manage and process your information is important to us. This Privacy Policy (the “Privacy Policy”) outlines how Vantar (“we,” “our,” or “us”), process the information we collect about you through our website, mobile apps, and other services (collectively, referred to as the “Services”), and when you interact with us through our customer service channels.

This document contains the following sections:

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2. How We Use Your Information
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Information We Collect

Information you provide

We collect information you provide when you use or apply to our Services or engage or communicate with us in other ways, as outlined below.

1. **Personal Information:** Includes your name, date of birth, marital status, social security number, photos of your face and government-issued identification documents, and other details on government-issued IDs.
2. **Contact Information:** Your email address, mailing address, and phone number.
3. **Financial Information:** Includes bank account and payment card details, information about income, account balances, transaction history, credit history, tax information, and credit scores.

4. **Profile Data:** Includes your username, password, knowledge assessment results, interests, preferences, feedback, and survey responses.
5. **Stored Content:** This includes photos from your mobile phone gallery or contacts stored on your mobile device or email accounts. We collect this information only with your permission.
6. **Additional Information You Provide:** This may include information provided through focus groups, survey responses, contests/sweepstakes, customer support, or memos you write when using our Pay & Request Service.
7. **Information for BankSync Service:** To process funding requests through our BankSync services, such as deposit, withdraw, and transfer, we collect information including name, email address, phone number, and bank account information of you or your recipients.
8. **Other Information You Provide:** Any additional personal data you choose to share with us. For instance, uploading a photograph to our Service must comply with our App Use Standards, which apply to all users. You may also provide information about additional authorized users, including their identity, contact information, and financial data.

Information you provide automatically

We also collect some information about you automatically when you use our Services. They are outlined below.

1. **Usage Information:** We collect details about your activity on our Services, such as device identifiers (e.g., IP address or mobile device ID), the pages or features you access, the time and date of each interaction, and similar usage data.
2. **Transactional Information:** When you complete a transaction through our Services, we collect details, including the amount, type, nature, and time and date.
3. **Location Data:** With your device permissions, we may collect your mobile device's GPS location. You can manage this collection through your device settings (see the Your Controls section below). Google may use technologies, including IP address, to approximate your location (see Google's Privacy Policy at <https://policies.google.com/privacy> for more details).

4. **Information Collected Through Tracking Technologies:** Along with our service providers, we use cookies and web beacons to automatically collect certain types of usage and device data when you use our Services or engage with our emails. This data includes your IP address, browser type, internet service provider, platform type, device type, operating system, date and time, unique device or account ID, usage patterns, and other related information. See the Your Controls section below for information on disabling cookies.
5. **Inferred Data:** We may also make inferences about specific attributes, such as gender, based on information like your first name.

Information collected from other sources

We also collect some information about you from other sources. They are outlined below.

1. **Vendors and Business Partners:** We collect details from companies we work with, such as your name, contact information, inferred preferences, and attributes, and assess fraud risk from partners who handle identity verification and fraud prevention.
2. **Linking Financial Accounts:** We may receive financial account information about you from third parties, such as your financial institutions. For example, Vantar offers account linking and aggregation services through Plaid, Inc. ("Plaid"). By using these services, you agree to Plaid's Privacy Policy (available at <https://plaid.com/legal/#end-user-privacy-policy>), granting Plaid the right to access and transmit your information as needed to deliver its services. If you previously used account linking services through a former provider, you authorize that provider to transfer data to Plaid.
3. **Connected Services:** If you link, connect, or log in to your Vantar account through a third-party service (e.g., Google, or Apple), that service may share information with us, such as profile details. The information shared depends on the third-party service and your privacy settings.
4. **Publicly Available Information:** This includes information available from public sources, such as contact details, interactions with our social media accounts, and other information from public websites.

5. Advertising Data: We collect data related to our ad campaigns on external platforms, including the ads you click on and other ways you interact with our ads.
6. Data from Other Users: If you appear in another user's contact list and they share that list with us, we collect your contact information and the relationship details provided by that user. #

Data Retention

Certain personal information is subject to record-retention requirements under applicable financial services laws and regulations. In particular, records related to your identity verification, account opening, transactions, and communications are generally retained for six (6) years following account closure (with certain records kept readily accessible for the first two years), consistent with SEC Rule 17a-4 and, where applicable, other broker-dealer or investment adviser recordkeeping rules and will be retained for the period required for legal and compliance purposes. Where no specific legal retention period applies, we retain personal information only as long as needed for the purposes described in this Policy. Retained records are used solely to meet our legal and regulatory obligations and are not used for any other purpose after your account is closed or a deletion request is processed.

How We Use Your Information

We use the information we collect for the purposes outlined below or as communicated to you at the time of collection:

1. Provide and Maintain Services: This includes processing account applications, verifying your identity, supporting and troubleshooting our Services, handling transactions, and managing billing and accounts.
2. Send Transactional and Relationship Communications: We may send confirmations, invoices, technical notices, customer support responses, software updates, security alerts, and information about your transactions.
3. Engage with You on Relevant Offers: We communicate with you about offers, newsletters, product announcements, partner offerings, surveys, contests, sweepstakes, events, and other updates we believe may interest you.
4. Personalize Your Experience: We tailor our Services by suggesting relevant content or customizing the content and ads you see.

5. **Analyze and Improve Our Services:** We monitor usage, conduct research, and support development efforts to enhance our Services.
6. **Manage Promotions and Rewards:** We facilitate contests, sweepstakes, and promotions, handling entries and delivering rewards.
7. **Ensure Security and Safety:** We work to protect our Services, business, and users by investigating and preventing fraud and other unlawful activities.
8. **Protect Our Legal Rights:** We protect or exercise our legal rights, including enforcing agreements and handling legal claims.
9. **Meet Legal and Regulatory Requirements:** We comply with applicable laws, such as those related to regulated investment advisers and broker-dealers.

Lawful Basis for Processing

Where applicable law requires us to identify a lawful basis for processing your personal information, we rely on the following:

Consent: When you provide consent for a specific purpose.

Contract: When processing is necessary to perform our agreement with you (e.g., providing the Services you signed up for).

Legal Obligation: When processing is required to comply with a legal or regulatory obligation.

Legitimate Interests: When processing is necessary for our legitimate interests or those of a third party, such as fraud prevention or improving our Services, and those interests are not overridden by your rights.

Lawful Basis for Processing

Depending on the nature of our relationship with you and where you're located, we rely on the following legal grounds to process your personal information:

Your Consent: In some cases, we ask for your permission before processing certain data, such as enabling a specific feature or sending you marketing communications. You may withdraw consent at any time going forward.

Performance of a Contract: We process information where it's needed to deliver the Services you've signed up for — for example, verifying your identity to open an account or completing a transaction you've requested.

Compliance with Law: Certain processing is required to meet our obligations under applicable financial services, tax, or other regulations.

Legitimate Interests: We may process information to support activities like fraud prevention, securing our platform, or improving our Services, provided those interests don't outweigh your own privacy rights and expectations.

Disclosure of Information

We disclose the information we collect for the purposes outlined below or as communicated to you at the time of collection:

1. **Authorized Vendors:** We share your information with third-party vendors and service providers who support us in services such as identity verification, fraud prevention, advertising, mailing, tax and accounting, contest fulfillment, web hosting, and analytics.
2. **Authorized Personnel:** Our employees, agents, consultants, contractors, and other authorized personnel, including those from our contractors, service providers, subsidiaries, and affiliates, may access user information as necessary in the ordinary course of our business.
3. **Legal and Law Enforcement:** We may disclose any information, including personal information, as we deem necessary to comply with applicable laws, regulations, legal processes, or government requests. We may also share information with other organizations to protect the rights, property, or safety of the company, its affiliates, employees, users, or others. We reserve the right to disclose a user's personal information if we believe, in good faith, that they are violating our Terms of Service, even without a subpoena, warrant, or court order.

4. **Banking and Rewards Partners:** When applicable, we share your information with banking partners and rewards partners (e.g., travel or shopping rewards partners) through which you can redeem rewards.
5. **Companies in Which You Hold Securities:** We may provide your name, address, email address, and securities positions to companies in which you hold securities if they request this information.
6. **Vantar Affiliates:** We disclose your information to affiliated companies within our organization when appropriate. These affiliates process any shared information in accordance with this Privacy Policy.
7. **Substantial Corporate Transactions:** In the event of a significant corporate transaction, such as a merger, reorganization, acquisition, or in the unlikely scenario of bankruptcy, we may disclose your information to the relevant parties involved.
8. **Legal Requirements:** We disclose information if we believe it is necessary to comply with any applicable law or legal process or to protect and defend the rights, interests, safety, and security of our company, our users, or the public.
9. **Social Media:** We may incorporate applications or widgets from social media platforms, enabling interaction and content sharing. These widgets, such as a Facebook “Share” or “Like” button, are visible on our web pages. Integration with social media networks (e.g., Facebook, X) may allow them to collect information about you, even if you do not interact with the widget. For details on data collection and privacy controls, please review the privacy policies of these social media networks, as they govern how your information is collected, used, and shared.
10. **Aggregated or De-Identified Data:** We may also disclose data in an aggregated or de-identified format that does not reasonably identify you.

Third-Party Tracking and Online Advertising

We work with third-party advertising and analytics providers to understand your online activities and present you with targeted advertisements. For instance, we use Google Analytics, and you can learn more about Google's data processing practices at “How Google uses information from sites or apps that use our services”: <http://www.google.com/policies/privacy/partners/>. These providers gather data about your interactions with our Services and other websites over time through cookies, device identifiers, and other tracking technologies. Information collected includes details like your

IP address, browser type, mobile network information, pages visited, time spent, links clicked, and conversion data.

We, along with our third-party partners, utilize this information to analyze and track usage, assess content popularity, deliver targeted ads on our Services and other platforms, and provide related services such as reporting, attribution, analytics, and market research.

For more details on interest-based advertising and how to opt out of targeted ads based on your web browsing data, visit www.aboutads.info/choices. Additionally, review your mobile device settings for options that allow you to control data collection for behavioral advertising.

As a self-directed broker-dealer, please note that we do not advertise specific securities within our Services.

Information Security

We maintain administrative, technical, and physical safeguards designed to protect your personal information, including: taking actual safeguards, e.g., encryption in transit and at rest, access controls, employee training, vendor due diligence, incident response procedures. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. If we become aware of a security incident affecting your personal information, we will notify you and take other steps as required by applicable law.

Your Rights & Controls

1. **Account Profile:** You can update certain information in your account profile by logging in. For some products and services certain information cannot be changed due to legal requirements, and we may be unable to fulfill such requests. Any changes to your profile must comply with our App Use Standards.
2. **Access to Device Data and Location:** You can manage our app's access to certain stored device data and your precise location through your device's settings. For instance, you may withdraw permission for the app to access your contact list or photo gallery.
3. **Communication Preferences:** You may opt out of receiving promotional emails by clicking the "unsubscribe" link in those emails. However, we may still send you

service-related or non-promotional messages such as account notifications, receipts, security alerts, and other transactional or relationship communications.

4. **Affiliate Sharing Opt-Out:** In some situations, you can limit data sharing among our affiliates. Please refer to our relevant Financial Privacy Notices. To exercise this option, contact us at hello@vantar.co
5. **Disabling Certain Data Sharing:** You may restrict the sharing of your information with our marketing partners, which limits personalized marketing across platforms. When disabled, we will no longer share your data with partners for these purposes.
6. **Cookie Controls:** Most web browsers accept cookies by default, but you can adjust your browser settings to delete or reject cookies and similar tracking technologies. Note that disabling these technologies may impact some features of our Services. If you switch devices, change browsers, or delete opt-out cookies, you may need to repeat this process.

Additional Privacy Rights

This section outlines additional information regarding personal data collection and the rights afforded to California and Virginia residents under the California Consumer Privacy Act (CCPA) and the Virginia Consumer Data Protection Act (VCDPA). Please note that the CCPA does not apply to non-public personal information collected by financial institutions, as this information falls under separate financial privacy laws. Likewise, the VCDPA does not apply to Vantar's entities classified as financial institutions. As such, these laws do not cover most of the information Vantar collects.

With certain limitations and exceptions, the CCPA and VCDPA provide residents of California and Virginia specific rights. Depending on your state of residence, you may have the right to:

- (a) confirm whether Vantar processes your personal data;
- (b) correct inaccurate personal information;
- (c) request, in an accessible format, details about the categories and specific data elements we collect;
- (d) delete your personal data;

(e) opt out of sales, sharing, targeted advertising, or certain profiling (as defined by the CCPA and/or VCDPA); and

(f) not experience discrimination for exercising these rights.

Vantar does not sell your personal information to third parties. However, we may allow third parties to gather information through our Services to support our advertising and marketing on other platforms. For more information, including how you can manage these options, please refer to the “Third-Party Tracking and Online Advertising” section.

We collect the following categories of personal information: identifiers (e.g., name, email address, IP address), online activity data (e.g., engagement with ads and promotional messages), and inferences (e.g., gender based on first name). For California residents, this list reflects our data processing over the past 12 months. More details, including information sources and processing purposes, are available in the “Information We Collect” section. We share this information with the categories of third parties listed in the “Disclosure of Information” section.

California and Virginia residents may exercise their rights under the CCPA and VCDPA (where applicable) by making a request. If you use the Vantar app, you can log into your account, go to the Security and Privacy menu, and select either “Download Personal Data” or “Request Data Deletion.” You may also reach out for assistance by emailing hello@vantar.co. We may verify your request by matching it with information we have on file. You can also designate an authorized representative to act on your behalf, but we will require proof of authorization and may ask for additional verification. If you are a Virginia resident and your request under the VCDPA cannot be fulfilled, you are entitled to appeal by emailing hello@vantar.co.

Children

We do not knowingly collect or request personal information from anyone under the age of 13 through our Services. If we learn that a child under 13 has shared personal information with us without being added as an authorized user by a parent or guardian, we will make reasonable efforts to delete that information. If you believe we may have received information from a child under 13 who is not an authorized user, please reach out to us at hello@vantar.co.

Transfer of Information

Our Services are designed for use both within and outside the United States. If you access our Services from a jurisdiction outside the U.S., please be aware that your information may be processed in the United States or other countries where data protection standards may differ from those in your home jurisdiction.

Updates to this Policy

This Privacy Policy may change over time. When updates are made, we will revise the "Effective Date" at the top and post the updated Policy. In certain cases, we may also provide additional notice, such as by displaying a statement on our website or sending you a notification. We encourage you to review this Policy regularly to stay informed of our privacy practices as you continue to use our Services.

Contact Us

If you have any questions regarding this Privacy Policy, please reach out to us at hello@vantar.co.