

## **Privacy Policy**

Last updated: [2-12-2022]

## **Our Commitment to User Privacy:**

This Privacy Policy ("Policy") describes how [[Allison Fintech Co]], doing business as [[ALLISON]], protects and manages your personal data, including:

- What data we collect when you sign-up for, use, or engage with any of our applications, products, services, or websites (collectively, the "Services");
- How we manage data from the beginning of your engagement onwards;
- The choices you have regarding how data is managed.

This Policy applies to information we collect in connection with your access and use of our Services. Please read this Policy carefully. By continuing to use or access our Services, you are consenting to the practices described in this Policy.

#### We Limit Use of Your Personal Data to:

- [[Providing, maintaining and improving our Services;
- Verifying your identity, where applicable;
- Communicating with you about new and existing Services;
- Protecting the legal rights, property and safety of our Services and users.]]

## **Sharing Personal Data with Merchants:**

We may be required to share your data with a merchant if you open a payment dispute for a transaction with said merchant.

# We Collect and Use Data:

#### Data We Collect:

Your name, email address, phone number, birth date, government-issued identification number, where necessary, payment card and bank information, if applicable, as well as other information you may be asked to provide when signing-up for an account, providing identity verification or engaging in a transaction.

# Other Data:

- Transaction Data: when, where and how a transaction takes place including, but not limited to, the devices and payment methods used;
- Device Data: hardware model, operating system, unique device identifiers, mobile network data as well as other data generated by a device's interaction with our Services;
- Location Data: to prevent fraudulent use of our Services;
- User Data: browser data, Internet Protocol ("IP") addresses and other data describing user engagement;
- Cookies: small data files we may store on your computer or mobile device memory to help us manage your engagement with our Services, including gathering aggregated data about engagement;

- Beacons: small electronic images we may use in our Services and emails to deliver cookies and measure user engagement.
- Information to Enhance your Experience: other data such as a profile picture that may enhance your experience.

#### Sources of Information:

- We also check that you are using our Services legally and are eligible for the Services you want to
  use. We protect the Services from fraudsters who may put you and your money at risk. To do
  this, we may collect data about you from companies that help us verify your identity, if
  applicable, prevent fraud or assess risk.
- We collect (and/or have collected during at least the 12-month period preceding the effective date of this Policy) information about you from the following categories of sources:
  - You directly, when you submit information to us or allow us to access information,
  - Your devices and how you interact with our Services, and
  - Other sources, including:
    - Identity Verification, if applicable. Information from third-party identity verification services and publicly available sources, including your government-issued identification number.
    - Eligibility, Compliance, and Fraud. Information about you from third parties for any investigation, eligibility, identity or account verification process, fraud detection process, or collection procedure, or as may otherwise be required by applicable law. This may include, without limitation, the receipt and exchange of account or transaction-related information with any consumer reporting agency.

# We Share Personal Data Under Controlled Circumstances:

- With third parties who may access data about you to provide you with the Services;
- With third parties who may access data about you to perform functions on our behalf;
- With financial institutions, processors, payment card associations and other entities that are involved in the payment process;
- With government and law enforcement where reasonably necessary to comply with applicable law, regulation, legal process, or governmental request;
- With others where reasonably necessary to protect the security or integrity of our Services or user safety;
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture or dissolution of all or a portion of our business;
- With your consent.

We may share aggregated and anonymized information that does not specifically identify you or any individual user of our Services.

## **Security:**

We take reasonable measures, including administrative, technical and physical safeguards to help protect your personal data from loss, theft, misuse, unauthorized access, disclosure, alteration and destruction. We maintain strict security standards and procedures with a view to preventing unauthorized access to your data by anyone, including our staff. We use leading technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data.

#### **Choices:**

- Personal Data: You can change or correct data about yourself through your [[ALLISON]] account
  at any time or by emailing us at [[support email address]]. You can also email us if you wish to
  deactivate your account. We may retain data about you for a period of time consistent with
  applicable law.
- Location Data, if applicable: Our mobile applications may require location data. If you do not
  grant us access to this data then you may not be able to use our Services. If you grant access to
  location data but later revoke this access your mobile device may no longer be able to use our
  Services. You may also uninstall our Services to stop collection of location data.
- Cookies: You can set your browser to reject cookies but our Services may not function properly in this setting.
- Marketing: You can opt-out of email or text messages by following instructions in these
  messages. If you opt-out we may still send you messages regarding transactions and services
  related to our ongoing business relationship.
- Notifications: Our Services may ask you for permission to send notifications to your device. Our services will still work if you do not grant us permission to send you notifications.
- Website Tracking: Certain websites you visit may provide options regarding advertisements you
  receive. For more information or to opt out of certain online behavioral advertising, please visit
  http://www.aboutads.info.
- Do Not Track: Some browsers support a "Do Not Track" feature, which is intended to be a signal
  to websites that you do not wish to be tracked across different websites you visit. Our Services
  do not currently change the way they operate based upon detection of a Do Not Track or similar
  signal.

# **Cookies and Tracking Technologies:**

We and our partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and gather information about our user base, such as location information based on IP addresses. You can control the use of cookies at the individual browser level.

Cookies are small text files that are placed on your computer by websites and services that you visit or access. They are widely used to make websites and services work and function with greater efficiency, and to provide information about our users' experience during use of, or interaction with, our websites, and Services. Some cookies last only for the duration of your web session and expire when you exit your browser; other cookies may last for longer than your web session, including after you exit your browser, for example by remembering you when you return to our website. The table below explains the cookies that we and our third party partners use and why.

Functional Cookie for Preferences and Settings: These cookies are used to record a user's choice and settings that enable our websites and Services to operate correctly or that maintain your preferences over time and may be stored on your device.

Functional Cookie for Sign in and Authentication: When you sign into a website or Service using your [[ALLISON]] account, we may store a unique ID number, and the time you signed in, in an encrypted cookie on your device. This cookie allows you to move from page to page within the website without having to sign in again on each page. You can also save your sign-in information, so you do not have to sign in each time you return to the site.

Analytics Cookie: To provide our products and improve your user experience on our websites and with our Services, we use cookies and other identifiers to gather usage and performance data. For example, we use cookies to count the number of unique visitors to a web page or service or to our blog and to develop other statistics about the operations of our Services. This may include cookies from us and from third-party providers. We use the information to compile reports and to help us improve our websites and Services.

#### **How to Control Cookies**

Most web browsers automatically accept cookies but provide controls that allow you to block or delete them. For example, in most modern browsers, you can block or delete cookies by clicking Settings > [[ALLISON]] > Cookies. Instructions for blocking or deleting cookies in other browsers may be available in each browser's privacy or help documentation. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Certain features of our Services may depend on cookies. Please be aware that if you choose to block cookies, you may not be able to sign in or use those features, and preferences that are dependent on cookies may be lost. If you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

## **Third-Party Analytics Services:**

We and our third-party service providers may sometimes use technologies to engage in data analytics, auditing, measurement, research, reporting, and debugging on our Services and to measure interactions with our services, such as tracking referral credits. For example, we use Google Analytics on our Services for such purposes. You can learn more about Google Analytics here and opt out here.

# **Third-Party Data:**

The Services contain hyperlinks to other websites or locations that we do not control and are operated and controlled by third parties ("Third-Party Websites"). Our Privacy Policy does not apply to these Third-Party Websites and we make no representations regarding the policies or business practices of any such Third-Party Websites.

## **Changes to this Policy:**

We can change this Policy. When the changes impact how we use your data in important ways, we'll tell you first by email.

We may amend this Policy from time to time by posting a revised version and updating the "Effective Date" above. The revised version will be effective on the "Effective Date" listed. We will provide you with reasonable prior notice of material changes in how we use your information, including by email, if you have provided one. If you disagree with these changes, you may cancel your account at any time. If you keep using our Services, you consent to any amendment of this Policy.

## **Contact Details**

If you have questions or comments, feel free to email us at [[compliance@tryallison.com]], call us at [[415-988-3623]], or write to us at [[2200 E Fowler Ave, Tampa, FL 33612]].