

CCPA Notice

Effective as of November 18, 2024.

California privacy notice

This notice describes our collection, use and disclosure of personal information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“CCPA”) and their rights with respect to their personal information. For purposes of this California privacy notice, “personal information” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA, such as information described in our [Privacy Notice](#) pursuant to the Gramm-Leach-Bliley Act.

Your privacy rights. If you’re a California resident, you have the following rights under the CCPA. As required by the CCPA, we compile metrics on California Privacy Rights Reporting that can be found here.

- Right to know. You can request information about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.
- Right to access. You can request a copy of certain personal information that we have collected about you.
- Right to deletion. You can request that we delete personal information that we collected from you.
- Right to correction. You can request that we correct inaccurate personal information that we have collected about you.

- Right to opt-out. You can request to opt-out of disclosures of your personal information that constitute “selling” or “sharing” of your personal information as defined in the CCPA.
- Nondiscrimination. You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

You may submit requests to exercise your right to know, access, deletion and correction by emailing help@acornsearly.com or writing to Acorns Early Legal, 5300 California Ave., Irvine, CA 92617. The rights described above are not absolute, and in certain cases, we may decline your request as permitted by law. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Identity verification. We need to verify your identity to process your requests to exercise your rights to know, access, deletion, and correction, and we reserve the right to confirm your California residency. To verify your identity, we may require you to log into your Acorns account if you have one, provide identifiers we can match against information we may have collected from you previously, confirm your request using the email address or telephone number used to make the request, provide government identification, or provide a declaration under penalty of perjury, where permitted by law.

Authorized agents. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

Information practices. The following describes our practices currently and during the past 12 months:

- Sales and sharing of personal information. Our use of the interest-based advertising services described above may constitute “sharing” of your personal information under the CCPA from which you have the right to opt-out. That is because these services use our users’ personal information (specifically, the contact data, device data and online activity data described above in Personal information we collect) to show you ads they think may interest you on other online services. You may opt-out of such sharing by Acorns by clicking ‘Your Privacy Choices’ at the footer of this site. Your request to opt-out will apply only to the browser and the device from which you submit the request. We do not “sell” personal information as defined by the CCPA, and have no actual knowledge that we have sold or shared the personal information of California residents under 16 years of age.
- Sensitive personal information. We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- Deidentified data. We do not attempt to reidentify deidentified information that we derive from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.
- Sources and purposes. We collect all categories of personal information from the sources and use them for the business/commercial purposes described above in the Privacy Policy.
- Collection and disclosure. The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart refer to the categories of information and third parties detailed above in the Personal information we collect section. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. We may also disclose personal information to professional advisors, law enforcement and government authorities, and business transferees as described above in the How we share your personal information section of this Privacy Policy.

<p style="text-align: center;"><u>Statutory category</u> Personal information we collect</p>	<p style="text-align: center;">Categories of third parties to whom we disclose the personal information for a business purpose</p>
<p><u>Identifiers</u></p> <p>Contact data</p> <p>Communications data</p> <p>Marketing data</p> <p>Device data</p>	<p>Affiliates</p> <p>Service providers</p> <p>Advertising partners</p>
<p><u>California Customer Records</u> (as defined in Cal. Civ. Code §1798.80)</p> <p>Contact data</p> <p>Communications data</p> <p>Marketing data</p> <p>Device data</p>	<p>Affiliates</p> <p>Service providers</p> <p>Advertising partners</p>
<p><u>Commercial Information</u></p> <p>Contact data</p> <p>Online activity data</p> <p>Marketing data</p>	<p>Affiliates</p> <p>Service providers</p> <p>Advertising partners</p>

<p><u>Internet or Network Information</u></p> <p>Device data</p> <p>Online activity data</p>	<p>Affiliates</p> <p>Service providers</p> <p>Advertising partners</p>
<p><u>Geolocation data</u></p> <p>Device data (e.g., city, state derived from IP address)</p>	<p>Affiliates</p> <p>Service providers</p>
<p><u>Inferences</u></p> <p>May be derived from any of the above categories</p>	<p>Affiliates</p> <p>Service providers</p> <p>Advertising partners</p>
<p><u>Sensitive Personal Information</u></p> <p>Government identifiers, such as Social security, driver's license, state identification card, or passport number</p> <p>Citizenship or immigration status</p> <p>Precise geolocation</p>	<p>Affiliates</p> <p>Service providers</p>

Exercising Your Rights

Depending on the nature of your relationship, we may need to confirm your identity or the identity of your authorized agent. To exercise one of the above rights, please submit a request at help@acornsearly.com or by telephone at (855) 739-2859.

- Only you, or someone that you authorize to act on your behalf, may make a request related to your Personal Information. An authorized agent may make a request on your behalf by providing written permission signed by you. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.
- We will need to confirm your identity or the identity of your authorized agent, before processing your request by asking you to log into your existing account (if you are a registered user) or by asking you for additional information, such as a government issued ID, to confirm your identity against information we have already collected.
- Please note that you may only make a request for access twice within a 12-month period.

If you have more questions

If you have any more questions about your family's personal information or our privacy policy, please email us at help@acornsearly.com or call us at (855) 739-2859. Or, you can write to us at the following address:

Acorns Early
5300 California Avenue, Irvine, CA 92617, USA
Attn: Data Privacy Officer