

**GOHENRY**  
**U.S. PRIVACY POLICY**

Last Revised 13<sup>th</sup> March, 2023

GoHenry, Inc. (“**GoHenry**,” “**we**,” “**our**,” “**us**”) respects your privacy, and we are committed to protecting it through our compliance with this privacy policy for U.S. residents (this “**Privacy Policy**”). This Privacy Policy describes the types of information we may collect from or about you and how we use, maintain, protect, and disclose that information. Please read this Privacy Policy carefully if any of the following applies to you:

- If you visit our website at [www.gohenry.com/us](http://www.gohenry.com/us) (“**Website**”);
- If you apply to receive any of our communications through any channel;
- If you use our Services (as such capitalized term is defined below), whether as a child, parent, or third party (such as a relative of a cardholder wishing to send money through our platform);
- If you otherwise use our app on your smartphone, tablet, and/or other device; or
- If you apply for or are accepted for a position of employment with us.

For the purposes of this Policy, our Website, mobile application, communications, and payment platform are referred to as our “**Services**.” Please read this Privacy Policy carefully to understand our policies and practices regarding your information. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing our Website and using the Services, you agree to this Privacy Policy.

**I. COLLECTION OF INFORMATION**

We collect personal information from you when you use the Services. When we use the term “personal information” in this Privacy Policy, we mean information that we collect from or about you or your devices. This includes information that identifies, relates to, describes, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with you or your device, as well as information we collect about the services you use, content you view on our Website and any details you submit. The personal information that we collect about you depends on whether you are a:

- Parent/guardian, relative, or customer of our Services;
- Child user of our Services
- Individual who gives money using our Services (“**Gifter**” or “**Relative**”));
- Visitor to our Website or prospective customer; or
- Job applicant or employee.

In addition, the type of information that we collect from you depends on your particular interaction with us.

**A. Information We Collect Directly From You**

In order to provide you with the Services, we may ask you to provide us with certain details or information. The personal information we collect about you depends on whether you are a parent/guardian (and customer of GoHenry), a Gifter or Relative (who gives money using our Services), a visitor to our Website or prospective customer, or job applicant or employee.

**Parents/guardians (who are customers of GoHenry)**

Information that you submit through the Services or that we otherwise collect may include:

- Basic contact information, including name, phone number, email address, postal address.
- Account information, including date of birth, passwords, password hints, security questions and answers, and other similar information.
- Identification information, such as last four digits of your social security number, date of birth, or copies of passport, drivers' license or other government identifications, or utility bills.
- Financial information, such as the last four digits and expiry date of your GoHenry card, debit card number, bank account information, and other similar financial information.
- Phone contact information, such as names, email addresses and telephone numbers stored in your mobile contact list.
- Any other information you directly provide when filling out a form, corresponding with us (e.g., *via* email or conversations with our customer services team ("**Member Services**") or by phone or chat sessions), providing us with feedback, reviewing our products, and other similar information.

### **Users over the age of 13**

Information that you submit through the Services or that we otherwise collect may include:

- Basic contact information, including name, phone number, email address, postal address.
- Account information, including date of birth, passwords, password hints, security questions and answers, and other similar information.
- Identification information, such as date of birth, photograph, or copies of passport, drivers' license or other government identifications, or utility bills.
- Financial information, such as the last four digits and expiry date of your GoHenry card, and other similar financial information.
- Phone contact information, such as names, email addresses and telephone numbers stored in your mobile contact list.
- Any other information you directly provide when filling out a form, corresponding with us (e.g., *via* email or conversations with our customer services team ("**Member Services**") or by phone or chat sessions), providing us with feedback, reviewing our products, and other similar information.

**Gifters and Relatives (who give money to a user of our Services)** Information that you submit through the Services or that we otherwise collect may include:

- Basic contact information, including name, email address, postal address.
- Identification information, such as the date of birth of Relatives who create accounts.
- Financial information, such as bank account information, and other similar financial information.

### **Visitors to our Website or Prospective Customers**

- Any information you directly provide when filling out a form, corresponding with us (e.g., *via* email or conversations with Member Services by phone or chat sessions), providing us with feedback, reviewing our products, and other similar information.

#### **Job applicants/employees**

- Basic contact information, including name, phone number, email address, postal address.
- Professional and employment-related information, such as job title and company.
- Education information, such as the information included in your curriculum vitae.

#### **B. Information We Collect Automatically**

When you use our Services, or visit our Website, we automatically collect certain information that is sent to us by your computer, mobile phone, or other device. To do this, we may use cookies, pixels, web beacons/clear gifs, and other tracking technologies (“**Tracking Technologies**”). The information collect may include:

- Device and technical information, such as IP address, iOS IDFA, iOS IDFV, Android GPS, ADID, device user agent functionality, browser type and version, operating system and platform, hardware, and other similar information.
- Usage data, such as the full uniform resource locators (URLs), information about page response times, lengths of visits to certain pages, page interaction information (such as scrolling, clicks, mouse-overs), error reports and performance data (i.e., details of the software or hardware related to an error, content of files you were using when an error occurred), troubleshooting and help data, and other similar information.

To learn more how we use cookies and other tracking technologies, see the “**Cookies and Tracking Technologies**” section below.

#### **C. Information We Collect from Third Parties**

We may obtain payments data from your third-party bank, including the name of your issuing bank, cardholder name, card expiry date, country of issue, card payment method, name and location of merchant, and similar information in connection with your use of the Services. Any information that we receive from third-party sources will be treated in accordance with this Privacy Policy. We are not responsible or liable for the accuracy of the information provided to us by third parties and are not responsible for any third party’s privacy practices.

## **II. HOW WE USE PERSONAL INFORMATION**

We use personal information we collect from you and about you for the following purposes:

- To establish your identity as part of your account application, process your account application, authorize your access to our services;
- To fulfill our legal obligations regarding Anti-Money Laundering and sanctions checks;
- To provide you with the Services or perform our contract with you;
- To process your payments in connection with our Services;
- To aggregate demographic data;
- To conduct research for the further development and improvement of our Services;

- To help investigate issues and resolve complaints regarding our Services;
- To prevent fraud;
- To investigate account activities; and
- To communicate with you and let you know about our Services, including offering newsletters, asking for your views in surveys, or providing customer support.

We use information we collect automatically for the following purposes:

- Run analytics and better understand your interaction with the Services,, although you may disable our use of IDFA and ADID for analytics purposes on your device; and
- Provide and improve our Services and their security.

### III. HOW WE SHARE PERSONAL INFORMATION

In certain circumstances, we may share your information with third parties. Specifically, we share your personal information:

- ***When the disclosure is requested by you.***
- ***With our business partners*** (e.g., banking partners such as Community Federal Savings Bank, card processor, issuing bank, investment services providers, payment services provider, risk and security system providers); ***our suppliers*** (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development); and/or ***our sub-contractors***. For example, companies we have hired to assist in protecting and securing our system and services may need access to personal information to provide those functions. Note that such business partners, suppliers and subcontractors will only have access to your personal information as reasonably necessary to perform these tasks on our behalf and will be obligated to not disclose or use it for other purposes.
- ***With advertising and analytics providers.*** In some instances, we may provide advertisers with aggregated information about our users, in which case we do not disclose identifiable information about you, nor information involving devices registered to children under 13 to them. (For more information about when we disclose information about children under 13, please see Section IV below.) We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a subsection of our users. In some instances, we may also use your personal information we have collected to enable our advertising partners to display relevant advertisements to you and others.
- ***With professional advisors.*** As necessary, we will share your personal information with professional advisors functioning as service providers such as auditors, law firms, or accounting firms.
- ***For legal and security reasons and to protect our services and business.*** We will share your personal information with government agencies, law enforcement agencies, public authorities, or any other relevant organizations: (i) in response to a legal obligation; (ii) if we have determined that it is necessary to share your personal information to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries, such as to investigate or prevent illegal activities; (iii) to protect the interests of, and ensure the safety and security, of us, our users, a third party or the public; (iv) to exercise or defend legal claims; and (v) to enforce our terms and conditions, other applicable terms of service, or other agreements.

- ***With our affiliates.*** We may share your personal information with companies within our corporate family.
- ***In connection with an asset sale or purchase, a share sale, purchase or merger, bankruptcy, or other business transaction or re-organization.*** We will share your personal information with a prospective buyer, seller, new owner, or other relevant third party as necessary while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.

#### **IV. CHILDREN'S PRIVACY**

During the registration process you may provide your child's name, telephone number for the device connected to our Service, and date of birth. You will also be provided a direct notice pursuant to the Children's Online Privacy Protection Act (COPPA), about the information that we collect, use or disclose during or as a result of your child's usage of our Services and given the choice of consenting to such data collection.

Following the creation of your child's account, we will only collect and use their personal information for the limited purpose of providing the Services. For example, we collect and process activity data about children indirectly, which includes (1) when a child uses his or her account, (2) the amount of the purchase, and (3) the location where the transaction took place. We also use technology to collect information automatically from our users, including children, when they use certain of our Services. We do not collect information from the child's device unrelated to the child's activity on the Services.

We only collect as much information about a child as is reasonably necessary for the child to use our Services, and we do not condition his or her participation on the disclosure of more personal information than is reasonably necessary. We encourage parents to educate their children about safe internet use and to monitor their children's use of social features.

We disclose information as follows:

- to you, when you request access to your child's account information or transaction history;
- to business partners or affiliates we use to support the internal operations of our Services (e.g., banking partners, card processor, issuing bank, investment services providers, payment services provider, risk and security system providers), our suppliers (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development); and/or our sub-contractors. Note that such business partners, suppliers and subcontractors will only have access to your personal data as reasonably necessary to perform these tasks on our behalf and will be obligated to not disclose or use it for other purposes. and who are bound by contractual or other obligations to use the information only for such purpose, and to keep the information confidential;
- if we are required to do so by law or legal process, such as to comply with any court order or subpoena, or to respond to any government or regulatory request;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of GoHenry, our customers or others, including to:
  - protect the safety of a child;
  - protect the safety and security of our Services; or
  - enable us to take precautions against liability or defend legal claims; and
  - to law enforcement agencies or for an investigation related to public safety.

In addition, if GoHenry is involved in a merger, divestiture, restructure, reorganization, dissolution, or other sale or transfer of some or all of GoHenry's assets, whether as a going concern or as part of bankruptcy,

liquidation, or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

At any time, you may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information.

You can review, change, or delete your child's personal information by:

- logging into your child's account and visiting his or her account profile page;
- contacting us through the Contact Us link;
- sending us an email at [help@GoHenryCard.com](mailto:help@GoHenryCard.com);
- Calling us at 877-372-6466.

To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

## V. COOKIES & TRACKING TECHNOLOGIES

We use cookies and other tracking technologies to help tailor the Services to the needs and interests of users and to improve the user experience, as well as for systems administration, troubleshooting, and security purposes. A cookie is a small text file stored on your device or computer when you access the Services. These small text files allow the website to recognize your computer or device at the next visit and remember your preferences and information. Cookies may also be used by a website to collect data about user activity or how you use the Services. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Services.

For more information about how we use cookies and similar Tracking Technologies, and your choices regarding the collection and use of such information, please review our Cookie Policy. To learn more about your choices regarding cookies and other tracking technologies, see the "Your Choices & Control" section below.

## VI. YOUR CHOICES & CONTROL

At any time, you have the following choices with regard to your personal information:

- ***Unsubscribe from Emails.*** We usually like to send our customers special promotional communications, such as newsletters, offers, and updates that we think will be of interest to them. If you would like to change the types of communications you receive from us or how you receive communications from us, you may do so at any time by using the "unsubscribe" and "manage preferences" links that will be present in any promotional emails that we send. Please understand that, even if you opt out of marketing communications, we may continue to send non-promotional communications such as confirmations of transactions, changes to the Services, or other information about your use of the Services.
- ***Marketing Preferences.*** If you are a user of our Services, you can update your preferences with regard to marketing by either logging into your account or by contacting us at: [unsubscribe@GoHenryCard.com](mailto:unsubscribe@GoHenryCard.com).

- **Cookies and Other Tracking Technologies.** You may control the way in which your devices permit the use of Tracking Technologies. If you so choose, you may block or delete our cookies from your browser; however, blocking or deleting cookies may cause some of the Services, including general functionality, to work incorrectly. Most browsers accept cookies automatically. However, you may be able to configure your browser settings to use the Services without some cookie functionality. You can delete cookies manually or set your browser to automatically delete cookies on a pre-determined schedule. For example, in the Chrome menu bar, select: More → Settings → Privacy and security → Cookies and other site data → See all cookies and site data, where you can choose to allow or block all or certain cookies, and choose to clear cookies when you quit Chrome.
- **Do Not Track Signals.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies that some parts of the Website may then be inaccessible or not function properly. To learn more about “Do Not Track” signals, you can visit <http://www.allaboutdnt.com/>.

Based on where you live, you may have additional rights in relation to your personal information that we have collected about you. Please navigate to the appropriate geographic notice below for further information on rights that you may have and how to exercise them.

## VII. SMS TERMS

- **Opting in:** if you want to opt-in to a text message service, **text JOIN to 20148**. Message frequency may vary.
- **Opting out:** if you wish to opt-out from a text message service, you can do so at any time by **texting STOP to 20148**. After you send the message “STOP” to us, we will send you a reply to confirm that you have been unsubscribed. After this, you will no longer receive messages from us. If you want to join again, just sign-up as you did the first time, and we will start sending messages to you again.
- **Help:** if at any time you forget what keywords are supported, just **text “HELP” to 20148**. After you send the message “HELP” to us, we will respond with instructions on how to use our service, as well as how to unsubscribe.

Before opting in to a text message service, please be aware of the following terms (the “SMS Terms”):

For text messaging in the US, by requesting, joining, agreeing to, enrolling in, signing-up for, acknowledging, or otherwise consenting to receive one or more text messages (“Opting In”), you accept these SMS Terms.

We will always use reasonable commercial efforts to deliver the automated marketing text messages to the number you provide through compatible wireless carriers. Carriers and gohenry are not liable for delayed or undelivered messages. The short code we use for some text message services may not be supported on all US carriers.

The list of participating carriers is as follows: AT&T, Verizon Wireless, Sprint, T-Mobile, U.S. Cellular, Boost Mobile, MetroPCS, Virgin Mobile, Alaska Communications Systems (ACS), Appalachian Wireless (EKN), Bluegrass Cellular, Cellular One of East Central, IL (ECIT), Cellular One of Northeast Pennsylvania, Cricket, Coral Wireless (Mobi PCS), COX, Cross, Element Mobile (Flat Wireless), Epic Touch (Elkhart Telephone), GCI, Golden State, Hawkeye (Chat Mobility), Hawkeye (NW Missouri), Illinois Valley Cellular, Inland Cellular, iWireless (Iowa Wireless), Keystone Wireless (Immix Wireless/PC Man), Mosaic (Consolidated or CTC Telecom), Nex-Tech Wireless, NTelos, Panhandle Communications, Pioneer, Plateau (Texas RSA 3 Ltd), Revol, RINA, Simmetry (TMP

Corporation), Thumb Cellular, Union Wireless, United Wireless, Viaero Wireless, and West Central (WCC or 5 Star Wireless).

As always, please know that message and data rates may apply for any messages sent to you from us, and to us from you. If you have any questions about your text plan or data plan, it is best to contact your wireless provider. T-Mobile is not liable for delayed or undelivered messages.

By Opting In to a text message service, you:

- consent to the handling of your personal information as described this privacy policy, and agree to resolve disputes with gohenry as described in our Cardholder Terms available on our website ([www.gohenry.com](http://www.gohenry.com));
- expressly authorize gohenry to use autodialer or non-autodialer technology to send text messages to the cell phone number associated with your opt-in;
- expressly authorize gohenry to include marketing content in any such messages;
- consent to the use of an electronic record to document your opt-in; and
- confirm that you are the subscriber to the relevant phone number, or that you are the customary user of that number and that you are authorized to opt-in. gohenry may terminate any text message service or your participation in it at any time with or without notice.

These SMS Terms still will apply if you withdraw the consent mentioned above or opt-out of the text message service.

For all questions about the text message service, please do not hesitate to contact us on [help@gohenrycard.com](mailto:help@gohenrycard.com) or call us on (877) 372-6466.

### **VIII. DATA SECURITY AND DATA RETENTION**

We developed and implement and maintain an information security program with administrative, technical, and physical safeguards designed to protect you information. You should take measures to protect your personal information. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the section entitled "Contact Us" below.

We will retain your information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required, or for the establishment, exercise or defense of legal claims, or for legitimate businesses purposes, or as provided by law.

### **IX. LINKS TO EXTERNAL SITES**

We may provide links third-party websites or other online platforms operated by third parties. If you follow links to sites not affiliated or controlled by us, you should review their privacy and security policies and other terms and conditions. We do not guarantee and are not responsible the privacy or security of these sites, including the accuracy, completeness, or reliability of their information. Information you provide on public or semi-public venues, including information you share on third-party social media platforms (such as Facebook or Instagram) may also be viewable by other users of the Services and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself,

imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Services. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

#### **X. CALIFORNIA RESIDENTS – CCPA NOTICE**

If you are a California resident, please click [here](#) to see the additional terms that apply to you.

#### **XI. CHANGES TO PRIVACY POLICY**

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy, and will notify you and take other steps as required by applicable law. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy. ***IF YOU DO NOT AGREE TO ANY UPDATES TO THIS PRIVACY POLICY PLEASE DO NOT ACCESS OR CONTINUE TO USE THE SERVICES.***

#### **XII. INTERNATIONAL USERS**

This Privacy Policy applies to individuals located in the United States. If you are not located in the United States, please review the applicable privacy notice for your jurisdiction.

#### **XIII. CONTACT US**

Should you have any questions about our privacy practices, including as they pertain to child accounts, or this Privacy Policy, please contact us at:

GoHenry  
Member Services  
79 Madison Ave, Floor 8, New York, NY 10016USA  
[help@GoHenryCard.com](mailto:help@GoHenryCard.com)

***or via our toll-free number:***

877-372-6466