

gohenry US privacy policy V 3.2

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Introduction

At gohenry we want to be clear and transparent about what information we collect, why we collect it, and how we use that information. Your family's privacy is important to us. This policy will evolve over time as we grow and we will post any changes to this page so please check it from time to time - and don't worry, if we're making major changes, we'll notify you via email, SMS or in-app notifications.

This privacy policy seeks to address any concerns with how your 'Personally Identifiable Information' (PII) may be used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

If you have any questions about your personal information or our privacy policy, please email us at: help@gohenrycard.com

"gohenry" means gohenry Inc, Service provider of gohenry Limited. The policy applies to the gohenry website, gohenry.com (the "**Website**"), the gohenry application for a mobile phone or any other device (the "**Application**"), gohenry Services and all related sites, applications, data storage, services and tools regardless of how you access or use them. By requesting, accessing, or otherwise using our services, products, features, functions, technologies, or content offered on the Website, the Application, and all related sites and applications, regardless of how accessed, including by computer, mobile phone, or any other device (collectively "**Services or gohenry Services**"), you accept this Privacy Policy and agree to the collection and use of your Personal Information in accordance with this Privacy Policy.

A "**gohenry Account**" means the service account at gohenry, established by the Primary Account holder (the parent or guardian), through which the gohenry Services are provided with regard to the Primary Account and Sub-Account(s) (child accounts). The terms "Primary Account," "Primary Account holder," "Sub-Account," and "Sub-Account Cardholder" shall have the same meanings as set forth in the gohenry Terms of Service.

Notice to parents/guardians and other Primary Account holders

As a parent or guardian (or other Primary Account holder) who has signed-up with a child to use the gohenry service, you are giving us explicit prior verifiable consent to collect, use and share their data in the ways specified in this policy. By providing a set of verified contact details for your child or teen, parents and guardians are explicitly giving their permission for their children to be contacted.

We are reliant on you providing accurate information in order to implement our Privacy Policy and cannot be held responsible if you circumvent age restrictions by providing incorrect date of birth information.

We encourage parents and guardians to explain to their children how their information will be used, as set out in this policy.

1. What personal information do we collect and why?

We may collect PII automatically, when you give it to us directly, or when we receive it from other sources such as our partners (as set forth below) or social media accounts you choose to link to our Services.

The PII we collect depends on the context of your interactions with our Services, and the choices you make and may include the following:

- **Contact and identification information** such as your name and your child's name, your phone number, email address, postal address, date of birth, identification document numbers, copies of identification documents (for example passport, driving licence, utility bills), personal description, social handles, photographs and other similar contact information.

- **Financial information** such as the last four digits and expiry date of your debit card number, bank account information, bank sort code, IBAN, payment reason, footprint of your credit history, and other similar financial information;
- **Transaction information** such as date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, senders and receiver's names and registration information, as well as other similar transaction information;
- **Demographic information** such as your or your child's age, gender, nationality, country and other similar demographic information;
- **Security information** such as passwords, password hints, security questions and answers and other similar security information;
- **Device and technical information** such as IP address, unique device identifiers (such as the IMEI number for phones, the MAC address of the device's wireless network interface), device functionality (browser type and version, operating system and platform, hardware used, browser plug-in types and versions) and other similar device and technical information;
- **Usage information** such as the full uniform resource locators (URLs), information about page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), error reports and performance data (ie: details of the software or hardware related to an error, content of files you were using when an error occurred), troubleshooting and help data plus other similar usage information;
- **Location information** such as your device location which may include a street name and city or GPS-location, ISP or your mobile carrier, the URL of both the site you came from and the one you go to next and other similar location information. We use GPS technology and Your IP address to determine your location - this may be used when the application is running in the foreground and the background of your device. This is used to prevent fraud, for instance if your phone is saying that you are based in the UK but your card is being used to enter into an ATM withdrawal or point of sale purchase in France, we may not allow that transaction to be processed. Please also know that most devices allow You to prevent location information from being sent to us;
- **Phone contact information** such as the names stored in your phone's contact lists, their email addresses and phone numbers. This is used when you want to make or receive payments to your contacts. We do not store this information or share it with anyone outside of GoHenry;
- **Any other information** you directly provide to us when filling out forms, corresponding with us (ie: email, conversations with Member Services by phone or chat sessions), filling out surveys, providing us with feedback and product reviews and other similar information.

You have choices about the PII we collect. So, when you are asked to provide us with your PII, you always have the right not to do so. Please note however that if you choose not to provide us with your PII when prompted, you may not be able to use our Services.

2. What do we do with your personal information?

The PII we collect from you is used for the following purposes:

- **To provide you with our Services:** we use your information to process your account application and authorize your access to our Services, process your payments and provide you with any other Services you request from us;

- **To communicate with you:** we use your information to share important news relating to our Services. We offer regular emails including newsletters to let you know about our Services. From time to time we may also contact you to ask your views on our Services, to fill out a survey, to send you marketing communications such as special offers and updates that we think will be of interest to you. We may contact you through email, notices posted on our website or app, text messages or push notifications. You may always change your communication preferences in your preference settings at any time and choose to hear a bit less or a bit more from us.
- **To conduct research:** we use your information to conduct research for the further development and improvement of our Services.
- **To help you:** we use your information to investigate and resolve complaints and services issues;
- **To improve the Services offered on our website and make them more secure:** we use your information so we can provide you with the most user-friendly navigation experience we can, and if we think it's necessary, for security purposes or to investigate possible fraud;
- **To comply with legal and/or regulatory requirements;** and
- **To better understand our business:** we use aggregate information to generate statistics about our users or the demographic distribution of visitors to our website. Note that aggregate is information combined from several measurements and doesn't identify you.

3. How do we protect your and your family's information?

We know that security is a major concern for many of our customers, and to give you peace of mind we have the most advanced security systems in place as required under both US and the very stringent EU data protection laws.

To protect your and your family's information we:

- Use secure server software to store your information;
- Encrypt your payment transactions;
- Implement security safeguards designed to protect your personal information such as HTTPS;
- Use full login and security question controls on our systems;
- Ensure that access to your information is limited to those who need it in order to do their job.
- Ensure that all our employees sign a confidentiality clause as part of their terms of employment.
- Follow tight security procedure, such as maintaining physical, electronic and procedural safeguards to protect your information from unauthorised access
- Continuously educate and train our employees about the importance of confidentiality and privacy of customer information;
- Continuously monitor our systems for possible vulnerabilities and attacks; and
- Regularly review and update our privacy controls and policy.

If we transfer your information to our servers, or a service provider or agent in another country, we will make sure that we and the service provider or agent agrees to apply the same levels of protection as apply to personal information held and processed in the US and to use your information only for the purpose of providing the service to us.

Please know however that although we do our best to protect your PII, we cannot guarantee the security of your information during transmission of information via the internet, as any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to do our best to prevent unauthorised access to your information.

How can you improve your and your family's security

To make sure you keep your information as secure as possible, choose a password that is unique – don't go for anything obvious like family names – and **never** reveal your password to anyone else. Avoid using the same password for several internet sites. When you finish using online websites for shopping or for financial transactions, close your browser to delete temporary cookies from any site you have visited.

We recommend that gohenry parents sit down with their children to ensure they understand the above information, and that they also choose a secure password and never share this information with anyone or any other websites.

4. Will we pass your or your family's personal information on to third parties?

First of all please rest assured that WE DO NOT SELL YOUR PERSONAL INFORMATION TO THIRD PARTIES. We also do not pass your or your family's personal information to third parties for marketing purposes without your permission.

We may however access and disclose your personal information in the following circumstances:

- When the disclosure is requested by you;
- When working with our business partners (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 for the performance of any contract we enter into with them or you. 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;
- When we sell, merge, or change the control of gohenry or in preparation for any of these events, in which case the prospective buyer will have the right to continue to use your personal information, but only in the manner set out in this privacy policy unless you agree otherwise;
- When working with advertising and analytics providers: If we decide to engage advertisers to promote our Services, the advertisers and their advertising networks may require anonymised personal information to serve relevant adverts to you and others. We will not disclose identifiable information about you to advertisers, but we may provide them with aggregate information about our users. 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.
- When required by law, subpoenas, court orders, or other legal process;
- When we have a good faith belief that such disclosure is reasonably necessary to:
 - Investigate, prevent, or take action regarding suspected or actual illegal activities;
 - Enforce our agreement with you;
 - Investigate and defend ourselves against any third-party claims or allegations;
 - Maintain the security and integrity of our Services;
 - Protect the rights and security of gohenry user's, personnel, or others.
- When we are under a legal duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request such as subpoenas and court orders. We will use our best efforts to notify you about such legal demands when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency.

5. How do we use cookies and track your website activities?

Like all major websites, we use cookies, small text files we send to your computer or other access device, to make interactions between you and us faster and easier. Cookies are not computer programmes, they can't pass

on viruses and can't read other information stored on your hard drive. They simply contain and pass on to our website as much information as you have disclosed to us. Cookies allow us to remember your registration details for future visits and allow you to move from one part of our website to another more easily.

It is possible to opt out of cookies via your browser's cookie settings. You can find more information on: <https://www.allaboutcookies.org/manage-cookies/>. But if you do this you will not be able to use the gohenry website properly, for example, you may need to enter information repeatedly, or you might not get personalized content that is meaningful to you as many of our functions are dependent on cookies. Cookies are computer specific, so if you log on to any site from a different computer, the cookie settings on that computer will apply.

Information about your visits to our website and your interaction with our services may be collected anonymously in order to support our marketing, both on our website and elsewhere on the internet. We sometimes use third-party service providers for this, and the information is collected using what is called a pixel tag, which is industry standard technology. None of your personal information will be collected or used during this process. It is simply about discovering the preferences and choices of our customers, so that we can make decisions about where and how to let people know about gohenry. If you would prefer not to have this anonymous information used please visit [your Online Choices](#) where you can find out more about both this and other online marketing practises and technologies.

6. How long will we retain your personal information?

If you choose to close your account, your personal information will stop being visible on our Services within 24 hours.

We retain your personal information after you have closed your account for the purposes for which it was originally collected, or for which it was further processed. If you want us to delete your personal information completely, you can ask us to do so by writing us on help@gohenrycard.com or calling our Member Services Team on (877) 372-6466.

We will then strive to delete your personal information as soon as reasonably possible. Please note however that we may be required, as a company providing financial services, to retain some of your personal to comply with our legal obligations such as Anti-Money Laundering (AML), the USA PATRIOT Act or the Bank Secrecy Act (BSA).

7. How do we protect children's data (COPPA)?

Protecting the privacy of the data of parents, children and other users of the gohenry Services is very important to gohenry. We follow the guidelines and rules laid down by COPPA (the Children's Online Privacy Protection Act) and have adopted these policies to keep your children safe.

Please note that there are a few exceptions to these policies as noted below under the heading "Exceptions to Verifiable Parental Consent and Information Collected from Children":

We therefore commit to the following principles regarding how we respect our child users' personal information:

- We will NOT knowingly collect, use, or distribute personal information from children under the age of 13 without prior verifiable consent from the parent or guardian (Primary Account holder).
- Personal information we collect from children under the age of 13 will be used solely by gohenry for internal purposes only and will NOT be sold or otherwise distributed to third parties other than as laid out in this Privacy Policy.
- We will NOT knowingly allow children under the age of 13 access to free form chat, message boards, email accounts, or other services within gohenry that would allow them to publicly post or otherwise distribute personal information without prior verifiable consent from a parent or guardian (Primary Account holder).
- We will NOT knowingly ask a child under the age of 13 to divulge more information than is needed to use any gohenry service.

- We will NOT knowingly keep any new personal information that is inadvertently included in a child's email submission, help inquiry, or other one-time request, if we know that the child is under the age of 13.
- We will NOT knowingly post any personal information that is inadvertently included in a child's submission to a general audience contribution area if we know that the child is under the age of 13. Upon notice to us, these submissions will be deleted and handled anonymously thereafter.
- We will NOT knowingly provide any direct link to websites that we feel are unsuitable for children or teens.
- There is currently no place on the gohenry website where a child could share any personal information outside of the Primary Account and Sub-Account(s). Should that change, we will advise children under the age of 13 that they MUST obtain permission from their parent or guardian before sharing ANY personal information.
- We will send the following communications to children & teens to make sure that they are able to make the best of the gohenry service:
 - Essential service communications, e.g. attempted spend at non-permitted merchants, responses to enquiries, etc.
 - gohenry push notifications and usage alerts, e.g. allowance notifications, available balance information, cards blocked or unblocked, transaction details on how much was spent and where the card was used, notifications if your child attempts to breach their spending rules, etc. These notifications form a major part of the gohenry service and we strongly recommend their acceptance, but you may opt-out of receiving these types of communications by turning off push notifications at your or their device level.
 - gohenry updates
- We will not send offers either to you, or your child, through the post.
- In line with Fair Information Practices, we will take the following responsive action should a data breach occur:
 - We will notify you via email within 7 business days
 - We will notify the users via in-site notification within 7 business days

8. Exceptions to Verifiable Parental Consent and Information Collected from Children

As previously stated in the Privacy Policy, any information collected related to your child will have been provided at sign up or by using the gohenry Services, and we will only use their contact information if you have given your consent for your child to receive our newsletter.

In the following instances, we will NOT obtain verifiable parental consent for the collection of a child's personal information:

- Collecting a child's contact information solely to directly respond to the child's request on a one-time basis (for example, to provide assistance with a particular customer service question). We will not use that information to re-contact the child for any other purpose.
- Collecting a child's contact information and the contact information of his/her parent or guardian (Primary Account holder) solely to directly respond more than once to a specific request from the child (for example, to satisfy the request for a newsletter subscription). In this instance, the parent or guardian (Primary Account holder) will be notified that the child made such a request and be informed of the information provided by the child. The parent or guardian will have an opportunity at any time to revoke the child's request (i.e., unsubscribe). We will not use the child's personal information to re-contact the child for any other purpose.
- When using persistent identifiers on our Website to support the internal operations of our Website which include: maintaining and analyzing the functioning of the Website; performing network communications; authenticating users; personalizing content on the Website; serving contextual advertising or capping the frequency of advertising; protecting the security or integrity of the user, Website or service; and to ensure legal and regulatory compliance. A "persistent identifier" is a series of numbers that we assign to a user but cannot be reasonably used to identify a specific user.

9. What are your rights regarding your personal information?

You can ask us what type of personal information we collect about you, the sources from which we collect it, the commercial purpose of the collection, and with whom we share it. You can find answers to these questions in section 3, 4 and 8 of this privacy policy.

You can ask us to view your personal information. You can contact us at any time to ask us to provide you with a copy of the information we hold about you. We will be happy to share it with you free of charge by mail or electronically, unless we are prohibited by law from doing so.

You can ask us to rectify the personal information we hold about you. You can also request us at any time to amend your details if they are deemed to be incorrect i.e. your email addresses, home address etc.

You can ask us to delete your personal information. Finally, you can always ask us to delete your personal information. Please note however that we may be required, as a company providing financial services, to retain some of your personal to comply with our legal obligations such as AML or KYC laws, the Patriot Act or the Bank Secrecy Act.

For all these requests please do not hesitate to write us on help@gohenrycard.com or call us on (877) 372-6466.

10. Can you opt-in or opt-out of receiving marketing offers or updates?

We usually like to send our customers special offers & updates that we think will be of interest to them – special deals for gohenry families, product updates etc. You can choose whether you or your child want to receive offers from us and from other companies. Here's how to let us know your preferences:

E-mail and Push notifications

- **Opting In:** At sign-up, you can easily opt-in before you submit complete your account application. If at this stage you chose not to opt-in you can update your preferences later by either logging into your parent account and opting-in from your Profile and Settings page (which is found in the "Account" tab) or by emailing us at optin@gohenrycard.com. If you'd like to opt-in your child after sign-up please also just email us at the same address to let us know.
- **Opting Out – Parents:** If you want us to stop contacting you about gohenry offers and updates please login to your parent account and unsubscribe from your Profile and Settings page (which is found in the "Account" tab). Alternatively, you can email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you. We will continue to send you important service information regarding your account – such as acknowledgement of payments received, gohenry mobile notifications and other such key communications.
- **Opting Out – Children:** If you or your child would like to opt-out of messages we send you about gohenry offers and updates please email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you or your child. Please remember that we will continue to send important service information to your child as part of the gohenry services.
- **Opting Out - all other gohenry users:** If you would like to opt-out of messages we send you about gohenry offers and updates please email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you.

11. 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 message 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 United States, 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 U.S. 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, NTeles, 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 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);
- 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 or call us on (877) 372-6466.

12. Links

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

These third-party websites are not subject to this privacy policy. We strongly recommend that you read the privacy policy of any websites that you visit through us.

13. 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@gohenrycard.com . Or you can write to us:

The Data Protection Officer, gohenry
WeWork, 54 W. 40th St., New York, NY 10018, USA

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