

Clerkie Money LLC Privacy Policy

Effective Date: December 2018

Clerkie Money LLC (“Clerkie Money” or “we”) respects your privacy and is committed to protecting your personally identifiable information (“PII”) that may be collected through your use of our website or mobile application (together, “Mobile Application”), or in applying for or receiving any of our products or services (“Services”). This privacy policy (“Policy”) describes how we collect and use your PII and how you can control that use.

Please read this Policy carefully. By using our Mobile Application or Services, you agree to our collection, use, and sharing of your PII as described in this Policy.

A Note to Users Outside of the United States.

If you are a non U.S. user of the Mobile Application or Services, by visiting the Mobile Application and/or providing us with information, you acknowledge and agree that your Personal Information may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Information may be less stringent than the laws in your country. By providing your information, you consent to such transfer.

So we are clear about the terminology we are using, when we use the phrase "*Personal Information*" in this Privacy Policy, we mean information that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing information. When we use the phrase "*Anonymous Information*" in this Privacy Policy, we mean information that is not associated with or linked to your Personal Information. Anonymous Information does not enable identification of or contact with individual persons.

Children

Our Services and Mobile Application are not directed to children and children are not eligible to use our Services. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from people we actually know are under 16 years of age, and no part of our Mobile Application or Services is designed to attract people under 16 years of age. If we later learn that a user is under 16 years of age, we will take steps to remove that user's Personal Information from our databases and to prevent the user from utilizing the Mobile Application and the Services.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on the <https://clerkie.io>, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

Information we Collect

Through your use of our Mobile Application and Services, we may collect PII, which is information that identifies an individual or relates to an identifiable individual. PII may include, but is not limited to, your first and last name, physical address, Social Security number, date of birth, and investment account information.

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

<i>Category</i>	<i>Examples</i>	<i>Collected</i>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans,	NO

	keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you (information you provide to us)
- Directly and indirectly from activity on our Mobile Application & our Services.
- From third-parties that interact with us in connection with the services we perform.

Information You Provide to Us

We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account settings, we may collect Personal Information such as your name, email address, phone number, and third-party account credentials (for example, your log-in credentials for a financial institution, financial service providers, social media, or other third party sites). If you provide your third-party account credentials to us or otherwise sign in to the Services through a third party site or service, you understand some content and/or information in those accounts (“Third Party Account Information”) may be transmitted into your account with us if you authorize such transmissions, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy. Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers on behalf of other businesses or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us, please indicate your preference by sending us an email at support@clerkie.io.

We may request additional PII that is necessary to provide one of our services (such as accessing your credit report), such as your physical address, Social Security number, mobile phone number, date of birth, bank account information and numbers, employment and income information. Additionally, we may collect PII to verify your identity, for security-related purposes, or other administrative purposes. In order to provide Services to you, we may on occasion supplement the PII you submit to us with information from third-party sources, such as consumer report information, including your credit score.

If you contact us, tell us your story, or otherwise provide us with information about yourself, we will maintain records of your correspondence. This may include any of your questions, comments, or suggestions. We may request access to your contacts in order to facilitate services including splitting bills, managing your budget with your partner, sharing accounts and transferring funds. You may also provide us with the email addresses of your contacts and include a personal message to your contacts if you choose to participate in our referral program, if available.

If you use our mobile application, we may ask for your permission to access certain information and features on your device, including your camera and photos, in order to facilitate the uploading of required documents or proof of identity. You may also enable identity verification through your device's Face ID or Touch ID feature, in which case you will provide your fingerprint or facial map data to your device. We do not collect Face ID or Touch ID data.

We may collect and store your location information if you enable your mobile device to send it to us. Certain features of the Services, including fraud detection and account locking features, may not be available if you do not enable this collection.

We may also receive Personal Information about you from your authorized representatives (such as your attorney, accountant, etc.). We consider such information to be Personal Information and may use and disclose it in accordance with this Privacy Policy.

Information Collected Automatically

We may automatically collect the following types of information as you use our Mobile Application and Services:

- **Usage Information:** We collect certain information automatically through your use of the Mobile Application, such as which of our web pages or mobile pages you access, the frequency of access, and what you click on while on our Mobile Application.
- **Location Information:** We may collect information about your actual location which may be determined from your IP address and other sensors that may reveal information on nearby devices, Wi-Fi access points, and cell towers.
- **Device Information:** We may collect information about the device you are using such as: hardware model, operating system, application version number, browser, and IP addresses.
- **Mobile Device Information:** In addition to the Device Information listed above, when you access our Mobile Application or Services via a browser on your mobile device or through the use of our

mobile application, we may also collect mobile network information including phone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.

Cookies and Other Tracking Technologies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes.

- ***Session Cookies:*** We use session cookies to make it easier for you to navigate our Mobile Application. The session ID cookie expires 24 hours after you sign in to our Mobile Application.
- ***Persistent Cookies:*** We use persistent cookies that remain on your hard drive for an extended period of time. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our Mobile Application. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

We may use a software technology called tracking pixels (a.k.a. web beacons or clear gifs) that help us better manage content on our Mobile Application by informing us what content is most effective. Tracking pixels are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, tracking pixels are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

We may also use other website or mobile tracking technologies, such as device fingerprinting, to identify you and keep track of your preferences, prevent fraudulent activity or improve Mobile Application security, assess the performance of the Mobile Application, and deliver content to you based on your interests on our Mobile Application and third-party Mobile Applications.

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, "cookie" information, the type of browser and/or device you're using to access our Services, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features.

Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on the Services. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible.

Information Collected From Other Websites and Do Not Track Policy

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

Account and Transaction Information

We collect information about your use of our Services. For example, in processing a payment with you, such information would include your name, amount of payment, and your bank account information, including account numbers, routing numbers, and similar information. Other information that we collect includes your transaction history, payment history, and account balance. We also collect tokens from online services and payment systems.

How We Use Information

We use PII we collect in the following ways:

- **Process Transactions:** We use PII to provide our Services, including to consider application(s) for a financial products and process payments
- **Provide financial services:** We use PII to provide our Services, including considering your eligibility for specific financial services from 3rd parties (including debt relief organizations, collections agencies and lenders)
- **Communicate:** We use PII to communicate with you about our Mobile Application and Services. This may include payment reminders, information that you have requested, or notification of important changes to our Mobile Application and Services. These communications may be delivered through push notifications if you have enabled that feature, or by phone call, text message, or email message.
- **Session Cookies:** We use session cookies to make it easier for you to navigate our Mobile Application. The session ID cookie expires 24 hours after you sign in to our Mobile Application.
- **Marketing:** We may occasionally send you information about products and services that we believe will be of interest to you. During any such communication, we will provide you with the option not to receive any future marketing communications.
- **Business obligations:** To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections
- **Safety:** As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- **As Required by Law:** To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- **Corporate Structure:** To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as

part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

- **Specific Purposes:** You may be asked to provide information for a specific purpose. For example, if you participate in our referral program, if available, you will be asked for information about your contacts. We will only use the information that you provide for the purpose for which you provided it to us.
- **Customer Support:** We may use your PII to provide you support or other services you have ordered. For example, we may need your information in order to provide technical support or answer questions about your account.
- **Post Testimonials:** If you choose to tell us your story or otherwise give a testimonial, we will review such information and may post such testimonial on our Mobile Application along with your name and any other PII that you choose to disclose on your testimonial. By submitting a testimonial, you consent to posting any information and content, including video content, you provide in such testimonial on our Mobile Application. If you submit a testimonial, you may revoke such consent at any time by emailing support@clerkie.io
- **Site Maintenance and Improvement:** We analyze how our users interact with our Mobile Application and Services in order to maintain and improve our Mobile Application and Services. We also use information that we collect to diagnose any problems with our Mobile Application or Services to improve the user experience.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

We do not rent or sell your Personal Information in personally identifiable form to anyone.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category I: Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

We reserve the right to share information, including PII, with third parties, as described below:

- **Service Providers:** We may share information with service providers that help us perform functions and process your transactions.
- **Provide financial services:** We use PII to provide our Services, including considering your eligibility for, and providing you with access to specific financial services from 3rd parties (including debt relief organizations, collections agencies and lenders)
- **Affiliates:** We may share information with our parent company Henry Labs, Inc., our affiliates, joint ventures, or other companies under common control with us.
- **Corporate Structure:** We may share information in connection with a merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets or if we undergo bankruptcy or liquidation.
- **To Prevent Harm:** We may share information if we believe it is necessary in order to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- **As Required by Law:** We will share information where we are legally required to do so, such as in response to court orders or legal process, to establish, protect, or exercise our legal rights, to defend against legal claims or demands, or to comply with requirements of mandatory applicable law.
- **With your Consent:** We may request your permission to share your PII for a specific purpose. We will notify you and request consent before you provide the PII or before the PII you have already provided is shared for such purpose.
- **Information that's been de-identified:** We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.
- **3rd party Businesses:** In certain situations, businesses or third party websites we're affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. One such service may include the ability for you to automatically transmit Third Party Account Information to your Services profile or to automatically transmit information in your Services profile to your third party account. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.
- **Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

Controlling Your Information

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- First / Last name
- Password
- Email address
- Other user profile information

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at support@clerkie.io.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@clerkie.io .

Security

Your account is protected by a password for your privacy and security. If you access your account via a third party site or service, you may have additional or different sign-on protections via that third party site or service. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism. appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

The security of your PII is important to us. We maintain reasonable physical, technical, and administrative security measures to protect and limit access to your PII. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your PII, we cannot guarantee its absolute security. If you have any questions about the security on our Mobile Application, you can contact us at support@clerkie.io.

What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by contacting us at support@clerkie.io . Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, Deletion, and Opt-out Rights

To exercise the access, portability, deletion, or opt-out rights described above, please submit a verifiable consumer request to us by either:

- Email: support@clerkie.io
- Mail: 619 7th St, San Francisco, CA 94103

You may also exercise your opt-out right to prevent the sale of your personal data here:
<https://app.clerkie.io/donotsell>

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person or an authorized representative of the person we collected personal information on.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Correction

If your PII changes, or if you no longer desire our service, you may correct or update your PII by contacting us at support@clerkie.io. If you have an account with us and your account is in good standing, you may also correct or update your PII by logging into to your account on our Mobile Application and updating your information there.

What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to support@clerkie.io , and we will try to resolve your concerns.

Applicable Law

This is a United States-based Mobile Application and Service that is subject to United States law. This Mobile Application and Service is controlled, operated, and administered by Henry Labs, Inc from its offices within the United States of America. This Policy is provided in accordance with and subject to applicable U.S. law. If you are accessing this Mobile Application from a location outside the United States, you hereby agree that your use of this Mobile Application and our collection and use of your PII is subject to this Policy.

Contact Us

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