

## I. Overview

SPARE. has developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Policy applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other SPARE. Users.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Policy. You can find the meaning of a capitalized term in the **Definitions** section.

If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please **contact us** if you have questions about our privacy practices that are not addressed in this Privacy Policy.

## II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- **Registration and use information** – When you register to use our Services by establishing an account, we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.
- **Transaction and experience information** – When you use our Services or access our Sites, for example, to receive money, or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or

requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.

- **Participant information** – When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
  - **Send or request money:** When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
  - **Add value to your accounts:** If you use our Services to add value to your Account or any other account you may have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the other party, or from the other party about you to facilitate the request.
- **Information about your friends and contacts** – It may be easier for us to help you transact with your friends and contacts if you provide Personal Data such as name, email address and telephone number about your friends and contacts while using a Service or if you connect your contact list or friend list to your Account. If you choose to connect your contact list information on your device with your Account and/or establish an account connection between a social media platform and your Account, we will collect and use your contact list or friend list information to improve your experience when you use the Services.
- **Information that you choose to provide us to obtain additional Services or specific online Services** – If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Policy.
- **Information about you from third-party sources** – We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- **Other information we collect related to your use of our Sites or Services** – We may collect additional information from or about you when you communicate with us, contact our customer support teams or

respond to a survey.

### III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Policy.

### IV. How Do We Process Personal Data?

We may Process your information for the following reasons:

- **To operate the Sites and provide the Services**, including to:
  - send or request money, add value to an account;
  - authenticate your access to an Account;
  - communicate with you about your Account, the Sites, the Services, or SPARE.;
  - create an account connection between your Account and a third-party account or platform; and
  - perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes.
- **To manage our business needs**, such as monitoring, analyzing, and improving the Services and the Sites' performance and functionality. For example, we analyze User behavior and perform research about the way you use our Services.
- **To manage risk and protect the Sites, the Services and you from fraud by verifying your identity**, and helping to detect and prevent fraud and abuse of the Sites or Services.
- **To market to you** by delivering marketing materials about SPARE. products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences to better match our understanding of your interests.
- **To provide personalized Services offered by SPARE. on third-party websites and online services.** We may use your Personal Data and

other information collected in accordance with this Privacy Policy to provide a targeted display, feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these online services and/or work with other third-parties such as advertising or analytics companies to provide these online services.

- **To provide you with location-specific options, functionality or offers** if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalized content.
- **To comply with our obligations and to enforce the terms of our Sites and Services**, including to comply with all applicable laws and regulations.
- **To make it easier for you to find and connect with others**, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- **To respond to your requests**, for example to contact you about a question you submitted to our customer service team.

## V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy. In addition, our Consumer Privacy Notice provides specific information about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

**With other members of the SPARE. corporate family:** We may share your Personal Data with members of the SPARE. family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of SPARE. products, Services, and communications.

**With other companies that provide services to us:** We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

**With other financial institutions that we have partnered with to jointly create and offer a product or service:** We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product. These financial institutions may only use this information to market and offer SPARE.-related products, unless you have given consent for other uses.

**With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers:** We may share information with the other participants to your transactions, including other Users you are sending or receiving funds from, and merchants or their service providers when you use the Services to pay for goods or services. The information includes:

- Personal Data necessary to facilitate the transaction;
- information to help other participant(s) resolve disputes and detect and prevent fraud; and
- aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

**With other third parties for our business purposes or as permitted or required by law:** We may share information about you with other parties for SPARE.'s business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to SPARE. or SPARE.'s corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;

- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of SPARE.'s business;
- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

**With your consent:** We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, SPARE. may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

## VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of SPARE.'s Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Policy, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-SPARE. account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, SPARE. and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Policy.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that SPARE shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

## VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of

Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our [Statement on Cookies and Tracking Technologies](#) to learn more about how we use Cookies.

## VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

- **Choices Relating to the Personal Data We Collect**
  - Personal Data. You may decline to provide Personal Data when it is requested by SPARE., but certain Services or all of the Services may be unavailable to you.
  - Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that SPARE. may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.
- **Choices Relating to Our Use of Your Personal Data**
  - Online Tracking and Interest-Based Advertising. We work with partners and third-party service providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related cookies and web beacons, in which case our advertising should not be targeted to you. You will continue to see our advertising on third party websites.
    - For more information on third-party advertising-related cookies and interest-based advertising, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit [About Ads](#).



- Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices).
- Personalized Services offered by SPARE. on third-party websites and services. You may manage your preferences for other SPARE. Services that are personalized and offered to you on third-party websites from your Account. We may also provide you with instructions and prompts on how to manage your preferences within the Service experience.
- Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.
- **Choices Relating to Sharing Your Personal Data**
  - If you reside in the United States and have opened an Account for your own personal and family or household purposes, please see our Consumer Privacy Notice for additional information on opt out rights you may have and how to exercise these rights.
- **Choices Relating to Account Connections**
- If you authorize an account connection to a third-party account or platform, such as a social media account, you may be able to manage your connection preferences from your Account or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.
- **Choices Relating to Cookies**
  - You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting [AboutCookies.org](http://AboutCookies.org). You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.
  - You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them.
  - You can learn more about our cookies and tracking technologies by visiting the Statement on Cookies and Tracking Technologies page.
- **Choices Relating to Your Registration and Account Information**

- If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- **Choices Relating to Communication**
  - **Notices, Alerts and Updates from Us:**
    - **Marketing:** We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the SPARE corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
    - **Informational and Other:** We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

## IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share

with a third-party based on an account connection that you have authorized.

## X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

## XI. What Else Should You Know?

### **Changes to This Privacy Policy.**

We may revise this Privacy Policy from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the “Policy Update” page of our website. We also may notify Users of the change using email or other means.

### **Transfers of Your Personal Data to Other Countries**

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Policy if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

## XII. Contact Us

You may contact us if you have general questions about our Privacy Policy and practices or questions about your Account information or Personal Data.

## XIII. Definitions

**Account** means a SPARE. member account.

**Device Information** means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

**Geolocation Information** means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

**Guest Transaction** means a person's use of the Services without logging into and/or establishing an Account.

**SPARE.** means SPARE., Inc. and subsidiaries or affiliates. In this Privacy Policy, SPARE. is sometimes referred to as "we," "us," or "our," depending on the context.

**Personal Data** means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account

number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

**Services** means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by SPARE. in connection with an Account or Guest Transaction.

**Sites** means the websites, mobile apps, official social media platforms, or other online properties through which SPARE. offers the Services and which has posted or linked to this Privacy Policy.

**Technical Usage Data** means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

**User** means an individual who uses the Services or accesses the Sites and has established a relationship with SPARE. (for example, by opening an Account and agreeing to the SPARE. User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Guest Transaction.

# Consumer Privacy Notice

Effective Date: July 23, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

<b>FACTS</b>	<b>WHAT DOES SPARE. DO WITH YOUR PERSONAL INFORMATION?</b>
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul data-bbox="524 1413 1284 1528" style="list-style-type: none"><li>• Social Security number and account balances</li><li>• Payment history or transaction history</li><li>• Credit history or credit scores</li></ul> When you are no longer our customer, we continue to share your information as described in this notice.
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their

	customers' personal information; the reasons SPARE chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does SPARE share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes –</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

<b>Questions?</b>	Call our customer service at 1-888-221-1161 or visit us at <a href="https://www.SPARE.com/privacy">https://www.SPARE.com/privacy</a> .
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<b>Who we are</b>	
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<b>Who is providing this Privacy Policy?</b>	This privacy notice is provided by SPARE., Inc. and is applicable to your personal U.S. SPARE. accounts.
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<b>What we do</b>	
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<b>How does SPARE. protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
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<b>How does SPARE. collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or provide account information</li> <li>• use your credit or debit card or give us your contact information</li> <li>• use your SPARE. account to send or receive funds</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul>
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	State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.
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<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies.
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.</li> </ul>
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

<b>Other important information</b>
<p>We may transfer personal information to other countries, for example, for customer service or to process transactions.</p> <p><b>California:</b> If your SPARE. account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.</p>

**Vermont:** If your SPARE. account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

**Nevada:** If your SPARE. account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from SPARE., you may be placed on our internal Do Not Call List by calling 833GOTSPARE