

# ALPHA Privacy Policy

**DATE LAST REVISED: JANUARY 1ST, 2019**

At ALPHA, our most important asset is your trust.

ALPHA is committed to maintaining the confidentiality, integrity and security of any personal information about our users. This Privacy Policy explains how we protect personal information provided through our website [www.alpha.money](http://www.alpha.money) (the "Website") and our mobile application (the "App") and how we use that information in connection with our service offered through either of these (the "Service"). "Personal information" for purposes of this Policy means information that identifies you, such as your name, address, phone number, fax number or email address.

ALPHA stresses its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

We update this Privacy & Security Policy periodically. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting.

If you have questions, comments, concerns or feedback regarding this Privacy and Security Policy or any other privacy or security concern, send an e-mail to [security@alpha.money](mailto:security@alpha.money).

## Your Privacy

### **YOUR PRIVACY IS NOT FOR SALE**

We take your privacy seriously. We do not sell or rent your personal information to anyone, for any reason.

### **YOU CAN DELETE YOUR DATA ANYTIME BY DISCONTINUING USE OF OUR SERVICE**

When you request us to delete your account for the Service, your Personal Information will be permanently expunged from our primary production servers and further access to your account will not be possible. We will also promptly disconnect any connection we had established to your Account Information (see below) and delete all account credentials.

However, portions of your Personal Information, in anonymous and aggregate forms, may remain on our production servers indefinitely. We reserve the right to use this aggregate data to improve our service and for other lawful purposes. Your data may also remain on a backup server or media but will be removed within a commercially reasonable period of time. ALPHA keeps these backups to ensure our continued ability to provide the Service to you in the event of malfunction or damage to our primary production servers.

Also, please note that we also may need to store your data as required by federal, state or local law.

### **EMAIL COMMUNICATIONS FROM US**

We provide our registered customers with periodic summaries of their account information and email alerts. We also allow users to subscribe to email newsletters and from time to time may transmit emails promoting ALPHA or third-party goods or services.

ALPHA subscribers have the ability to opt-out of receiving our promotional emails and to terminate their newsletter subscriptions by following the instructions in the emails. Opting out in this manner will not end transmission of service-related emails, such as email alerts.

## Your Security

### **WE ARE COMMITTED TO KEEPING YOUR PERSONAL INFORMATION SECURE**

The security of your personal information is important to us. As discussed below, we utilize physical, electronic and procedural security measures to protect against loss, misuse, and alteration of information under our control. We offer industry-standard practices and security measures to safeguard and secure the

personal information we collect. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect ALPHA accounts and systems from unauthorized access.

When you register for the Service, ALPHA requires a password and Account PIN from you for your privacy and security. ALPHA transmits information such as your Registration Information or Account Credentials securely.

Our servers are in a secure facility. Access requires multiple levels of authentication. Security personnel monitor the system 7 days a week, 24 hours a day.

We employ controls to limit access to our databases to those employees or service providers with a business need to access them. We encrypt your account password and PIN so that your password cannot be recovered, even by us. All backup drives and tapes also are encrypted.

#### **WE ENFORCE PHYSICAL ACCESS CONTROLS TO OUR FACILITIES**

No employee may put any personal information or account information on any insecure machine (i.e., nothing can be taken from the database and put on an insecure laptop). In addition, ALPHA frequently tests the Service for any failure points that would allow hacking.

However, it is important to understand that these precautions apply only to our Service and systems. We exercise no control over how your information is stored, maintained or displayed by third parties or on third-party sites.

#### **OUR SERVICE ENSURES SECURE COMMUNICATIONS WITH ENCRYPTION**

From the time you submit your Login ID, Password and PIN so that communications between your device and ALPHA are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

You are responsible for Keeping your Login ID, Password, Mobile Device, and Email Account Confidential

We maintain strict rules to help prevent others from guessing your password. We also recommend that you change your password periodically. Your password must be 8-16 characters in length. You are responsible for maintaining the security of your Login ID and Password. You may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at [security@alpha.money](mailto:security@alpha.money), but in any event you should change your password immediately via the Service.

You also agree that you control and limit access to the email account and mobile device. If your email address or your mobile device changes, you are responsible for informing us of that change.

We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of this Privacy and Security Policy or the Terms of Use.

## Your Personal Information

#### **ALWAYS KEEP YOUR PERSONAL INFORMATION UP TO DATE TO GAIN FULL ACCESS**

It is your responsibility to keep your personal information up to date by updating your profile at [www.alpha.money](http://www.alpha.money). We are not responsible for costs or other issues arising from you not keeping your personal information up to date.

Certain areas and features of our Website or Service are available to you without registration or the need to provide to us any information. However, other features of the Website or the Service may require registration, which involves provision of an email address, a password and a PIN (collectively the "Registration Information").

In order to benefit from the full functionality of the Service, you also must provide your third-party account credentials ("Account Credentials") to allow ALPHA and our partners to access your account data at those other financial institutions ("Account Information") for your use.

From time to time we may request other personal information to provide you with other benefits of the Service. In all such instances, you will be given the opportunity to provide or to decline to provide that information, and it will be used only for the stated purpose.

#### **WE USE AND SHARE YOUR PERSONAL INFORMATION TO PROVIDE YOU WITH BETTER SERVICE**

ALPHA and its affiliated companies use and disclose your personal information only as follows:

1. to analyze site usage and improve the Service;
2. to deliver to you any administrative notices, alerts and communications relevant to your use of the Service;
3. to market our products and services and those of our business partners that we believe may be of interest to you;
4. to fulfill your requests for certain products and services;
5. for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
6. to third-party contractors that provide services to ALPHA and are bound by these same privacy restrictions;
7. to enforce our Terms of Use; and
8. as otherwise set forth in this Privacy and Security Policy (including disclosures to protect our rights, if required by law, or relating to a transfer of control or sale of assets, as discussed below).

#### **RESTRICTIONS AND MONITORING OF OUR PARTNERS**

Any partners we work with have been selected in accordance with our security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

We may also use third party vendors or service providers to help us provide the Service to you, such as sending e-mail messages on our behalf or hosting and operating a particular feature or functionality of the Service. We require such third parties to maintain the confidentiality of the information we provide to them.

#### **DISCLOSURE OF YOUR INFORMATION TO PROTECT OUR RIGHTS, IF REQUIRED BY LAW OR FOR CERTAIN TRANSACTIONS**

Notwithstanding the foregoing, ALPHA reserves the right (and you authorize ALPHA) to share or disclose your personal information when ALPHA determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

1. To enforce our rights against you or in connection with a breach by you of this Privacy and Security Policy or the Terms and Conditions;
2. To prevent prohibited or illegal activities; or
3. When required by any applicable law, rule regulation, subpoena or other legal process.

## Your Online Activity: How We Use Cookies & Beacons

#### **ONLINE SESSION INFORMATION AND USE IS COLLECTED TO IMPROVE YOUR EXPERIENCE**

We may also collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our design and functionality and service.

#### **WE USE COOKIES AND BEACONS TO IMPROVE YOUR EXPERIENCE**

“Cookies” are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer’s hard drive. ALPHA may set and access cookies on your computer to track,

gather and store preferential information about you. We encode our cookies to prevent others with whom we do not have a relationship with from being able to interpret the information stored in them.

Note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate cookies, the full functionality of the Service may be impaired for you.

Web beacons are images embedded in a Web page or email for the purpose of measuring and analyzing site usage and activity. ALPHA, or third party service providers acting on our behalf, may use Web beacons to help us analyze usage and improve the Service.

ALPHA or third party service providers, including online ad networks, may use cookies and Web beacons to serve ads for us or our partners services on our or third party Websites. If you would like to opt out of third-party vendor's use of cookies, visit the [Network Advertising Initiative opt-out page](#).

#### **WE MAY USE THIRD PARTY PROVIDERS TO HELP US IMPROVE OUR SERVICE**

We may also use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyze visitor activity. We may permit these service providers to use cookies and other technologies to perform these services for us. We do not share any personal information about our customers with these third party service providers, and these service providers do not collect such information on our behalf. Our third party service providers are required to comply fully with this Privacy Policy.

## Other Data We Collect & How We Use It

### **OTHER DATA THAT WE COLLECT**

We collect many kinds of data to provide and improve our service to you and to ensure compliance with all laws and regulations. This includes any information you provide to us while using our Service as well as when, where and how you:

1. make payments, purchases and transfers or
2. interact with us via social media (Facebook, Twitter, etc.) or
3. your use of our website, mobile application or services or
4. any other services provided by our partners

We may combine the Personal Information we collect from you with information we collect from other sources, both offline and online.

### **HOW WE USE ANONYMIZED DATA: PEER COMPARISONS, RESEARCH & DEVELOPMENT**

ALPHA may make anonymous or aggregate personal information and disclose such data only in a non-personally identifiable manner to:

1. Organizations approved by ALPHA that conduct research into consumer spending; and
2. Users of the Service for purposes of comparison of their personal financial situation relative to the broader community.

Such information does not identify you individually.

### **DATA TRANSFER UPON CHANGE OF CONTROL OR SALE OF ASSETS, BUT ONLY IN ACCORDANCE WITH THIS POLICY**

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change of control, reorganization, bankruptcy, or asset sale. If we sell, merge or transfer any part of our business, part of the sale may include your personal information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.