

Privacy Policy - EarlyBird

Effective Date: June 1, 2020

Last Updated: August 14, 2020

At EarlyBird Central, Inc. (“EarlyBird,” “we,” or “us”), we have established a Privacy Policy to protect the information that we secure for business purposes. We are committed to protecting the personal information that we have obtained about you. This Privacy Policy describes how we collect, use, share, and protect your personal information. By accessing or using our website, mobile application, (collectively, the “Site”) or services, you acknowledge that you have read, understood, and agree to this policy. If you cannot agree to this policy, then please do not use our Site or services. To further understand our policy, please review the following details:

Information Collected from You

We collect personal information from parents in order to facilitate the creation of custodial accounts or Uniform Gifts to Minors Act (“UGMA”) accounts for your children, and allow family and friends to gift financial investments into your children's investment portfolio. This information may include:

- Contact information such as name, email address, home address, phone
- Billing information such as credit card number, and billing address
- Financial information such as bank or brokerage account numbers, types of investments
- Social Security number
- Credential information that you create to access our Site or services such as user name, password, and personal identification number (“PIN”)
- Other information that you voluntarily provide such as your profile picture and the content of any videos you upload to the Site
- Other information that you voluntarily give us access such as the information stored in your Contacts

You have the ability to review and edit some of the information collected about you through “Personal Information” section of the Site. However, you may need to contact us directly to review and edit certain sensitive personal information.

In order to create an account for a child, we will need the parent of the child to supply the following information about the child:

- Child first and last name
- Child date of birth
- Child Social Security number
- Child profile picture (optional)

We understand the sensitivity of your child's personal information and will limit our use of your child's personal information to what is necessary to provide you with our services.

For EarlyBird users that are not opening custodial investment accounts, but are using the app to send gifts to children (givers), we only collect:

- First Name
- Last Name
- Email Address
- Phone Number
- Financial information such as bank or brokerage account numbers, types of investments

Referral Program

If you wish to refer friends or family members to EarlyBird, you may share your referral link individually with those friends or family members.

EarlyBird does not directly collect any personal information from your friends or family members when you share your referral link with them. Personal information is only collected if the referral chooses to sign up with EarlyBird. You will, however, receive certain communications from us about your referrals. For example, you will be notified if your friend or family member signs up for EarlyBird. We may also use the referral link for the purposes of crediting their/your account with any referral offer to which you may both be eligible.

Information Automatically Collected

We collect certain information automatically through your use of our services, such as which of the pages on our Site that you access, the frequency of access, and what you click on while on our Site. We collect information about the device you are using to access the Site, such as hardware model, operating system, application version number, browser, and IP addresses.

Cookies

We place "cookies" on your computer or device when you use our Site. Cookies are small text files that we place in your computer or device to track your usage of our Site. Other information you provide to us may be linked to the data stored in the cookie. A cookie assigns a unique numerical identifier to your browser or device, and may enable us to recognize you as the same user who has previously used our Site, and relate your use of the Site to other information about you.

You can also learn more about online advertising cookies and your ability to opt-out of certain online advertising cookies by visiting the following websites: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org/choices>. For your mobile device, you can understand which third parties have currently enabled cookies on your mobile device and how to opt-out of some of those cookies by accessing the Network Advertising Initiative's website at <http://www.networkadvertising.org/mobile-choices> from your mobile device. On your mobile

device you may also select “Limit Ad Tracking” (on iOS devices) or “Opt out of Interest-Based Ads” (on Android). Even if you disable tracking, keep in mind that you may still receive interest-based advertising, including from third parties with whom your information had been previously disclosed and that you may still receive advertising from third parties, though such advertising may not be based on your interests and preferences.

This Site does not respond to “Do Not Track” signals.

Analytics

We may allow third parties to collect information about the users of our Site. Such third parties may collect Personal Information about your online activities over time and across different websites when you use our Site. We do not control these third parties, who may engage in practices that differ from those described in this Privacy Policy.

The Site also uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics may set cookies on your browser or mobile device or read cookies that are already there to collect information. Google Analytics may also receive information about you from apps you have downloaded that partner with Google. Google Analytics collects information such as how often you use the Site and how you use the Site. We use the information provided by Google Analytics to improve the Site and service. For more information regarding how Google collects, uses and shares your information and how to opt out of certain uses please visit <http://www.google.com/policies/privacy/partners/>. By using the Site, you consent to the processing of data about you by Google as described here and in Google's privacy policy.

Use of Personal Information

We use your personal information to provide you with our services. For parents, we use the personal information you provide to set up and maintain your account and deposit gifts into your account for your child. Children’s information provided by parents is used to set up the account in the child’s name. For givers, we use your personal information to process your gift to your intended recipient. We use your personal information if you choose to subscribe to our newsletter or sign up for our waitlist. We also use your personal information to comply with regulatory requirements, prevent fraud, enforce this Privacy Policy and any other agreements you have entered into with us, for any purpose for which you provide consent, and for any other legitimate business purposes.

We also use personal information to communicate with you about your account, such as to enable security functions such as two-factor authentication or to notify you about gifts or other account activity. Such communications may be made by email or, with your consent, by sending text messages to your mobile device.

Sharing Personal Information

We may share your personal information with analytics providers to understand how our Site and services are being used. We may also share your financial information with our transaction providers in order to process your transactions.

We may share personal information when required by law or legal process, and we will endeavor to ask for and obtain your permission in such situations. We may also be required to obtain your authorization before disclosing certain types of personal information.

We may share personal 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.

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, your personal information may be sold or transferred as part of such a transaction as permitted by law and/or contract. We cannot control how such entities may use or disclose such personal information.

We may share your personal information as appropriate to carry out any other legitimate business purposes permitted by law, such as sharing with our service providers and other partners that provide support to us when providing services to you.

Payment Providers

EarlyBird uses Dwolla, Inc. (“Dwolla”) to facilitate ACH transactions in connection with our services. If you sign up for EarlyBird’s services, you expressly consent to EarlyBird sharing your contact and billing data with Dwolla for the purposes of opening and supporting your account. You are responsible for the accuracy and completeness of that data. To learn more about Dwolla’s privacy practices, visit their website at <https://www.dwolla.com/legal/privacy>.

We also use Plaid Technologies, Inc. (“Plaid”) to gather your data from financial institutions. This data may include information from all your sub-accounts (e.g., checking, savings, and credit card) accessible through a single set of account credentials, even if only a single sub-account is designated by you. By using our Services, you grant us and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy (<https://plaid.com/legal>).

Links to Other Websites and Services

The Site may contain links to outside services and resources, the availability and content of which EarlyBird does not control. We are not responsible for examining or evaluating, and we do not warrant the offering of these services and resources or the content of these websites. EarlyBird does not assume any responsibility or liability for the actions, products, and content of

these and any other websites. Any concerns regarding any such services or resources should be directed to the service or resource.

Protecting Personal Information

In order to protect your personal information, we maintain electronic and procedural safeguards, which we review regularly in keeping with technological advances. Accounts are protected by encryption and authentication. Account activity is monitored to identify unauthorized transactions. We use 256-bit encryption to protect and secure all of our user's personal information and transaction history. We also restrict access to your personal information. Unfortunately, no security system is 100% secure, thus we do not guarantee the security of all personal information you provide to us via our interactions.

Children's Personal Information

Our services are not intended for use by children. We do not knowingly collect personal information from children under the age of 18 years. Please contact us if you believe we may have unknowingly collected information from a child under 18 years of age, and we will take steps to delete any such personal information.

Changes to Our Privacy Policy

EarlyBird's most current Privacy Policy will be available on our website at <http://www.getearlybird.io/legal> or at the bottom of the homepage. You are encouraged to review it periodically to familiarize yourself with our Privacy Policy and how it may apply to your personal situation. If there are any material changes or amendments to the Privacy Policy, we will notify you by posting an updated Privacy Policy to the Site.

Contact Us

For additional information or questions, please contact us at: info@getearlybird.io