

THIRD-PARTY ACCOUNT (TPA) DATA POLICY

Safehold, Inc. (“Safehold”, “we”, “our” or “us”) is committed to protecting the data that we collect from third-party accounts (“TPAs”) of financial services institutions, like banks, that users choose to link with the Better platform.

This Third-Party Account Data Policy (“TPA Policy”) identifies and describes the ways in which we collect, use, and share the information received from third-party financial institutions regarding our customers’ TPAs (“TPA Data”).

Please carefully review this TPA Policy, the Privacy Policy, General Terms of Service, Supplemental Payment Services Agreement, and any documents incorporated herein by reference. If you do not agree with any of the terms of this TPA Policy, Privacy Policy, the General Terms of Service, or the Supplemental Payment Services Agreement, please do not access or use Better and do not connect Better with a TPA. To the extent any term or condition disclosed in this TPA Policy conflicts with any term or condition disclosed in our Privacy Policy, this TPA Policy prevails at all times.

A. SCOPE

This TPA Policy covers information we receive from financial institutions when a customer links Better with a TPA. As discussed in our General Terms of Service, Better uses Plaid to connect to TPAs. When a user chooses to link a TPA, the user will be redirected to a screen operated by Plaid in order to provide the information (e.g., username, password) Plaid requires in order to log into your TPA and link it with the Better platform. By using Better to access a TPA, you authorize Plaid to use and store the information that you submitted for that purpose. Before connecting a TPA, please review [Plaid’s Privacy Policy](#). Safehold is not responsible for the manner in which Plaid uses and shares user data. If do not agree with Plaid’s data use and sharing practices, or the data use and sharing practices disclosed in this TPA Policy, do not use Better to access or link to any TPAs.

B. TPA DATA WE COLLECT

When you connect Better with a TPA, Plaid will collect identifiers and login information required by the provider of your TPA, such as your username and

password, or a security token. In some cases, Plaid may also collect your phone number, email address, security questions and answers, and one-time password (OTP) to help verify your identity before connecting your TPA. By linking Better with your TPA, you give us and Plaid the authority to act on your behalf to access and transmit your TPA data from the relevant bank or other entity that provides your financial accounts. You may also provide us with identifiers and other information, including your name, email address, and phone number, when you contact us or enter any such information using Better.

By connecting Better with a TPA, you authorize us to collect the following types of information associated with your linked TPA:

- Account information, including financial institution name, account name, account type, account ownership, branch number, IBAN, BIC, and account and routing number;
- Information about an account balance, including current and available balance;
- Identifiers and information about the account owner(s), including name, email address, phone number, date of birth, and address information; and
- Information about account transactions, including amount, date, payee, type, quantity, price, location, involved securities, and a description of the transaction.

When you use your device to connect to a TPA, we receive identifiers and electronic network activity information about that device, including IP address, hardware model, operating system, which features within our services you access, and other technical information about the device. We also use cookies or similar tracking technologies to collect usage statistics and to help us provide and improve our services.

C. USE OF COLLECTED TPA DATA

We use your TPA Data for a number of business and commercial purposes, including to operate, improve, and protect the services we provide, and to develop new services. More specifically, we use your TPA Data:

- To operate, provide, and maintain our services;

- To improve, enhance, modify, add to, and further develop our services;
- To protect you, our partners, Better, Plaid, and others from fraud, malicious activity, and other privacy and security-related concerns;
- To develop new services;
- To provide customer support to you, including to help respond to your inquiries related to our service;
- To investigate any misuse of our service, including violations of our Terms of Service, criminal activity, or other unauthorized access to our services; and
- For other notified purposes with your consent.

D. HOW WE SHARE TPA DATA

We share your TPA Data for a number of business purposes:

- With Plaid;
- To enforce any contract with you;
- With our data processors and other service providers, partners, or contractors in connection with the services they perform for us or Plaid;
- If we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena);
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
- Between and among us and our current and future parents, affiliates, subsidiaries and other companies under common control or ownership;
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of you, our partners, Plaid, and others; or
- For any other notified purpose with your consent.

We may collect, use, and share TPA Data in an aggregated, de-identified, or anonymized manner (that does not identify you personally) for any purpose permitted under applicable law. This includes creating or using aggregated, de-

identified, or anonymized data based on the collected information to develop new services and to facilitate research.

We do not sell or rent TPA Data that we collect.

E. OUR RETENTION OF TPA DATA

We retain TPA Data for no longer than necessary to fulfill the purposes for which it was collected and used, as described in this TPA Policy, unless a longer retention period is required or permitted under applicable law. As permitted under applicable law, even after you stop using or terminate your account with Better, we may still retain your TPA Data. However, your information will only be processed as required by law or in accordance with this TPA Policy. Please refer to the “Your Data Protection Rights” section for options that may be available to you, including the right to request deletion of TPA Data. You can also contact us about our data retention practices using the contact information below.

F. YOUR DATA PROTECTION RIGHTS

Under the California Consumer Privacy Act (“CCPA”), and subject to certain limitations and exceptions, if you are a California resident, you may have the following rights with respect to TPA Data we have collected about you that constitutes personal information under the CCPA:

- To request access to more details about the categories and specific pieces of personal information we may have collected about you in the last 12 months (including personal information disclosed for business purposes);
- To request deletion of your personal information;
- To opt-out of any “sales” of your personal information, if a business is selling your information; and
- To not be discriminated against for exercising these rights.

To exercise your data protection rights, you can contact us as described in the “Contact Us” section below. You may be required to provide additional information necessary to confirm your identity before we can respond to your request. We will consider all such requests and provide our response within a

reasonable period of time (and within any time period required by applicable law). Please note, however, that certain information may be exempt from such requests, for example if we need to keep the information to comply with our own legal obligations or to establish, exercise, or defend legal claims.

G. CHANGES TO THIS POLICY

We may update or change this TPA Policy from time to time. If we make any updates or changes, we will post the new policy on our website at www.heybetter.co and update the effective date of this TPA Policy. We may also notify you of any material changes in accordance with our Terms of Service and Privacy Policy, as appropriate.

H. CONTACT US

You may contact us with any questions regarding this TPA Policy via email at privacy@heybetter.co or write to us at:

Safehold, Inc.
Attn: Legal (Privacy)
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San Jose, CA 95126
USA

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