

Percapita Privacy Policy

Effective Date: 04.07.2023

This Privacy Policy describes how Percapita Group, Inc., and its subsidiaries ("Percapita" "we" or "us") collect and use your personal data in connection with Percapita products and services, including your access to, usage of or submission of information through (a) the Percapita web site available at www.percapita.com (b) any mobile device application made available by Percapita, and (c) the online and offline product and service offerings Percapita owns, operates or markets.

In this Privacy Policy, the above (a), (b) and (c) are referred to collectively as the "Percapita Offerings." Any device, including a computer or mobile phone, used to access Percapita Offerings is referred to in this Privacy Policy as a "Device." This policy describes the choices available to you regarding our use of your personal data and how you can access and update this data. Percapita Offerings include software and services that we own and operate directly, as well as software and services that we market or provide from or on behalf of third parties.

If you have any questions regarding this Privacy Policy, please contact us at customerservice@percapita.com or by writing to:

Percapita Group, Inc.
Attn: Customer Support
169 Madison Avenue, #2309
New York, New York 10016

By accessing, using or submitting any information through any of the Percapita Offerings you agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide us with any personal information and do not access or use the Percapita Offerings.

The Percapita Offerings are intended for a general audience. We do not knowingly collect personal information from children under the age of 13. We will delete any personal information collected that we later determine to be from a user younger than the age of 13. If you are a parent or guardian of a child under the age of 13 and you believe he or she has disclosed personal information to us, please contact Customer Service using the contact information set forth above.

Your personal information may be transmitted to and maintained on computers located outside of your state or the United States. If you are from outside the United States and use the Percapita Offerings, please be aware that the data protection laws in the United States may differ from those of the country where you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States. In addition, such data may be stored on servers located outside your resident jurisdiction and in jurisdictions that may have less stringent privacy practices than your own. By using the Percapita Offerings or providing us with any information, you consent to the transfer to, and processing, usage, sharing, and storage of your information, including personal information and Biometric Information (defined below), as set forth in this Privacy Policy.

I. INFORMATION COLLECTED VIA THE PRODUCTS

Percapita may obtain various types of personal data about: (a) users of the Percapita Offerings; (b) Devices and (c) non-customer visitors to Percapita's website. This data may include:

1. Contact information (name, address, phone number, and email address);
2. Information about products ordered or provided;
3. Information about purchases you may make;
4. Information about you relating to any bank accounts you may link to the Percapita Offerings, which may include transaction data, identity authentication data, transaction information, account balance or other account details;
5. Information collected through Internet-based and e-commerce activities such as information obtained from log files, cookies, clear gifs (*i.e.*, web bugs), images, and scripts;
6. Customer service and demographic data such as gender, income level, and information about your prior experiences with Percapita's products;
7. Information collected from our third-party service providers;
8. Information you may make available through interactive features of the Percapita Offerings
9. Information required to help us verify your identity or comply with legal obligations associated with processing financial transactions (*e.g.*, "know your customer" information);
10. Biometric Information, including for example your voice print, fingerprint or facial geometry scan, and
11. Other transaction-related data.

We also may use certain tracking technologies described below to collect, store, or accumulate certain non-personally identifiable information concerning your use of the Percapita Offerings, including your browsing history, preferences, internet addresses, unique identifiers, Device types, Device location, and other similar information.

Biometric Information

A biometric identifier is an identifier related to a person's human characteristics, which can be used to uniquely identify that person. Common forms of biometric identifiers that you may use in your daily life include fingerprints, veins in your palm, face recognition, voice recognition, and iris or retina recognition. When Percapita talks about "Biometric Information," we are referring to any biometric identifiers we may collect about you in order to identify you as you use the Percapita Offerings, or in providing you access to other financial services.

During the Percapita Offerings process, Percapita captures your Biometric Information in the form of a selfie taken on a mobile device. Such data is then encrypted and temporarily stored to authenticate your identity. Your Biometric information will be analyzed via an algorithm. If it is a match, your identity is authenticated, and you will be able to proceed with the next step in the Percapita Offerings process.

Percapita takes the security of your Biometric Information seriously. Percapita and its third party vendors implement effective data security safeguards to protect your Biometric Information that is captured, used and stored by them from improper disclosure, access or acquisition. Your biometric data will not be stored for longer than seven (7) business days, at which time it will be deleted and removed from Percapita's and our third party vendor's servers. Your biometric data will never be sold to a third party entity.

II. INFORMATION COLLECTED THROUGH SOFTWARE AND SERVICES

When providing the Percapita Offerings we may also collect and store information about your Devices, including:

1. Device information, such as the operating system version, processor type, memory space, and the like;
2. Information about software on your Device, including the version of certain software programs and when they were installed and/or upgraded;
3. Information collected from user settings, logs, configuration files, and other system or software-level information;
4. Information about your location obtained by converting your IP address into a geolocation or by accessing your Device's GPS coordinates, which can include general location information such as city, state or geographic area. If you have enabled location services on your Device and agree to the collection of your location when prompted by an Percapita Offerings, we will collect location data when you use the Percapita Offerings even when they are closed or not actively in use; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your Device.

Opting Out of Location Tracking. If you initially consented to the collection of geo-location information through the Percapita Offerings, you can subsequently stop the collection of this information at any time by changing the preferences on your Device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the Percapita Offerings.

Percapita Offerings may contain social media buttons, such as Facebook, Instagram, Snapchat and Twitter (which may contain widgets such as the "Share This" or other interactive programs). Your interactions with these platforms are governed by the privacy policies of the companies providing them. We may collect information about you from those platforms that you have made available via your privacy settings on that platform.

We may also use third party data collection tools to provide us with analytics data regarding your interaction with the Percapita Offerings.

III. INFORMATION USAGE

You hereby agree that Percapita may use the personal data that you submit or that Percapita collects in order to:

1. Accomplish its business purposes, including to deliver or provide the Percapita Offerings, establish or maintain customer and business relationships, improve the Percapita Offerings or develop new Percapita Offerings, provide access to Internet-based and e-commerce activities, perform accounting functions, process payments requested via the Percapita Offerings, and conduct other activities as necessary or appropriate in connection with the Percapita Offerings.
2. Market its products and services to you, and the products and services of third parties, including to send you information about products, services, or promotions.

Opt-Out: You may opt out of these promotional communications by following the instructions in each message, or by contacting us at Customersupport@percapita.com.

3. Send you service updates, announcements, and alerts related to the Percapita Offerings, including notices of security incidents, downtime, or planned maintenance. If you do not wish to receive these service communications, you have the option of deactivating your account and ceasing your use of the Percapita Offerings.

In addition, Percapita may sell, transfer, or disclose personal data to our service providers under written contracts as needed for such service providers to perform services on our behalf, including to fulfill our obligations to you. If Percapita has knowledge that a Percapita business partner or service provider is processing your personal data in a way that is contrary to this Privacy Policy, Percapita will take reasonable steps to prevent or stop such processing. In such case, you agree that Percapita will not be held liable for the misuse of your data. We may also provide you with the ability to interact directly with and provide information to service providers we partner with. When you leave our app or website to interact with a service provider, you should read its privacy practices regarding how they use that information and other information they may collect about you.

Percapita may sell, transfer, or disclose personal data, including your contact information, to our affiliates, licensees, partners, and other third parties in accordance with the terms of written agreements for legitimate business or marketing purposes.

Percapita may share aggregated information and non-identifying information with third parties for industry research and analysis, demographic assessments and other similar purposes. For example, Percapita may use aggregated and non-identifying information to derive statistics about the spending habits of our users, and performance of the Percapita Offerings, and to publish blog posts, articles, or other communications on our web site, app and social media channels.

Percapita will, in its sole discretion, disclose your personal data to third parties in certain additional cases: (1) when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with the rights of Percapita or its customers or vendors; (2) when we believe in good faith that the law

requires us to do so; (3) to a subsequent owner, co-owner, or operator of a website or product or in connection with a merger, consolidation, or restructuring, or the sale of our interests and/or assets, or other corporate change, or during the course of any due diligence process for such potential transactions, including situations where such process does not lead to a consummated transaction; and (4) in situations involving threats to the physical safety of any person.

IV. INFORMATION SECURITY

Your data is of the utmost importance to us. We use Secure Sockets Layer (SSL) and other transmission technologies to encrypt your personal data so it cannot be read in transit. In addition, we use secure technology, privacy protection controls, and restrictions on employee access to safeguard your personal information in storage.

Please note, however, that although we employ these and other security measures to safeguard the security of your personal information, no transmissions made on or through the Internet are guaranteed to be secure. Therefore, we cannot ensure the absolute security of any information you transmit to us, and you use our Percapita Offerings and provide us with your information at your own risk.

V. TRACKING TECHNOLOGIES

We and our marketing partners, affiliates, or analytics or service providers, may use technologies such as cookies, beacons, tags, browser and Device fingerprinting, network traffic monitoring, active scripting, recognition technologies and scripts, to analyze trends, administer the Percapita Offerings, track users' movements through the Percapita Offerings, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

We may not control those tracking technologies and are not responsible for them. However, you consent to potentially encountering third-party tracking technologies in connection with use of our Percapita Offerings and accept that our statements under this Privacy Policy do not apply to the tracking technologies or practices of such third parties.

There may be other tracking technologies now and later devised and used by us in connection with the Percapita Offerings. Further, third parties may use tracking technologies in connection with our Percapita Offerings, which may include the collection and storing of information about your online activities over time and across third-party websites or online services.

We may partner with one or more third parties to either display advertising on the Percapita Offerings or to manage our advertising on other sites. Our third-party partner(s) may use tracking technologies to gather information about your use of the Percapita Offerings and other websites to provide you targeted advertising based upon your browsing activities and interests. If you wish not to have this information used to serve you targeted ads, you may be able to opt-out by visiting: <http://www.networkadvertising.org/managing/opt-out> or <http://www.aboutads.info/choices>.

Statements regarding our practices do not apply to the methods for collecting information used by these third parties or the use of the information that such third parties collect. We make no representations regarding the policies or practices of third party advertisers or advertising networks or exchanges or related third parties.

VI. OTHER SERVICES

If you click on a link to a third-party site, you will leave the site you are visiting and be redirected to the site you selected. Because we cannot control the activities of third parties, we do not accept responsibility for any use of your personal data by such third parties, and we do not guarantee that they will adhere to the same privacy policies as Percapita. The provision of a link to any other website or internet location within the Percapita Offerings is for your convenience and does not signify our endorsement of such other website or internet location or its contents. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. We encourage you to review the privacy policies of any other service provider from whom you request services. If you visit a third-party site that is linked by any Percapita Offerings, you should read that third-party site's privacy statement before providing any personal data.

Our Percapita Offerings may include social media features, such as a "Share This" button that allows you to like us on Facebook or share our content on Twitter. These features may collect your IP address and information regarding your use of the Percapita Offerings. Social media features are either hosted by a third party or hosted directly on our systems. Your interactions with these features are governed by the privacy statement of the applicable company.

VII. CALIFORNIA CONSUMER PRIVACY ACT, (the "CCPA")

Categories of Personal Information We Collect

Along with the information in this Privacy Policy as a whole, the CCPA requires us to describe the information we collect in certain "categories." The categories we collect may include:

1. Identifiers (such as real name, alias, postal address, social security number, driver's license number, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers);
2. Personal information specified under California law, including bank account number and other financial information;
3. Commercial information (such as transaction data);
4. Internet or other network or Device activity (such as browsing history and information on interaction with a website, application, or advertisement);
5. Geolocation data (at an IP-based or city/state/zip level);
6. Inference data about you drawn from the data in this section (based on user profile information);
7. Legally protected classifications (such as age and gender);
8. Biometric Information; and

9. Other information that identifies or can be reasonably associated with you (e.g., information you voluntarily provide as you use the Percapita Offerings, such as additional profile information or user-generated content).

The Sources From Which the Categories of Personal Information Are Collected

We collect personal data directly from information you provide to us; indirectly from our affiliates, service providers, and other vendors; indirectly through your interactions with websites or advertisements; and through the other means referenced under Sections I and II of this Privacy Policy.

Business Purposes for Our Collection of Personal Information

The following is a list of the business purposes for our collection of information.

1. Provide the Percapita Offerings you have requested, including invoicing and accounting;
2. Respond to your request for information and provide you with more effective and efficient customer service;
3. Provide you with updates and information about the Percapita Offerings;
4. Contact you by email, postal mail, or phone regarding our Percapita Offerings and third-party products, services, surveys, research studies, promotions, special events, and other subjects that we think may be of interest to you;
5. Customize the advertising and content you see via the Percapita Offerings;
6. Help us better understand your interests and needs, and improve the Percapita Offerings, including through research and reports, and test and create new products,
7. features, and services;
8. Secure our websites and applications, and resolve technical issues being reported;
9. Comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others;
10. The processing of biometric information for the purpose of uniquely identifying a California resident; and
11. Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others.

Sharing of Categories of Personal Information

We may share categories of personal information to accomplish the various business purposes above and as described throughout this Privacy Policy.

CCPA Rights Disclosure

If you are a California resident, the CCPA may allow you to make certain requests about your personal information. Specifically, the CCPA may allow you to request us to:

1. Inform you about the categories of personal information we collect or disclose about you and the categories of sources of such information;
2. Inform you about the business or commercial purpose for collecting personal information and the categories of third parties with whom we share/discard personal information (which is also disclosed in this Privacy Policy);
3. Provide you with the specific pieces of personal information we collect about you; and
4. Delete personal information we have about you.

Please note that certain information may be exempt from such requests under California law. For example, we need certain information in order to provide the Percapita Offerings to you. You may only make such a request twice within a twelve-month period. Requests are generally free; however, we may charge a reasonable fee or deny your request if it is manifestly unfounded, excessive, or repetitive.

To make a CCPA request, please contact us at Customer support@percapita.com. We will request information, which at a minimum will include your name and email address, to verify your identity. We may request additional information to verify your identity before responding to a request. Under the CCPA, you may have an authorized agent submit a request on your behalf, and we will collect certain authorization and verification information from the agent and you in such circumstances.

The CCPA further provides you with the right to receive information about the financial incentives that we offer to you, if any, and the right not to be discriminated against for exercising your rights under applicable law.

If you would like further information regarding your legal rights under California law, please contact us at Customer support@percapita.com.

California Do Not Sell Notice and Information Request

If you are a California resident, the CCPA provides you with the right to opt out of the "sale" of your "personal information." We may allow some of our advertising partners to collect certain pieces of information from our site visitors, such as Device identifiers, cookies, advertising IDs, IP addresses, and usage activity, so that we and our partners can deliver ads that are more relevant to you. This type of information sharing with our advertising partners may be considered a "sale" under the CCPA. If you want to opt out of these activities, please contact us at Customer support@percapita.com. Please note that some or all of the Percapita Offerings may not function if you choose to opt out of such activities. In addition, we may offer our users referral programs or other incentive programs whereby you provide us with personal information about yourself or your friends or colleagues and receive a reward when they sign up for the Percapita Offerings.

If you are a California resident, California Civil Code Section 1798.83 allows you to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for the third parties' direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding

twelve calendar months. If you are a California resident and would like to make such a request, please submit your request in writing to:

Percapita Group, Inc.
Attn: Customer Support
169 Madison Avenue, #2309
New York, New York 10016

VIII. MISCELLANEOUS

You can access, update or correct your information, or otherwise ask us questions about this Privacy Policy by contacting Percapita as follows:

Percapita Group, Inc.
Attn: Customer Support
169 Madison Avenue, #2309
New York, New York 10016

We may update this Privacy Policy from time to time to reflect changes to our information practices. When we make changes to this Privacy Policy, we will revise the “Effective Date” at the beginning of this Privacy Policy. If the changes to the Privacy Policy are material, we will provide you with a notice within the Percapita Offerings or via email if we have your email address on file. Any material changes to this Privacy Policy will be effective thirty (30) calendar days following notice of the changes within the Percapita Offerings. These changes will be effective immediately for new users of the Percapita Offerings. If you object to any such changes, you must notify us prior to the effective date of such changes that you wish to deactivate your account. Continued use of the Percapita Offerings following notice of any such changes shall indicate your acknowledgement of and agreement to such changes.

IV. ACCEPTANCE AND CONSENT

Your use of one or more of Percapita Offerings, including disputes concerning privacy, is subject to this Privacy Policy. By using Percapita Offerings, you acknowledge that you have read this Privacy Policy and the notices provided herein, including but not limited to notice regarding the collection and use of Biometric Information. Your use of Percapita Offerings is your affirmative consent granting Percapita the right: (a) to collect, use and store the personal data and information identified in this Privacy Policy, including but not limited to Biometric Information, and (b) to share the personal data and information identified in this Privacy Policy, including but not limited to Biometric Information, with Percapita’s third party service providers subject to the restriction and limitations set forth in this Privacy Policy. By using Percapita Offerings you accept and consent to the terms and conditions of and the practices set forth and described in this Privacy Policy.