

MAPLE US LLC

PRIVACY AND DATA PROTECTION POLICY AND NOTICE

1. INTRODUCTION

- 1.1 Maple US LLC and/or any of our affiliates and subsidiaries (collectively, “**we**”, “**us**”, “**our**” or “**Maple**” and similar forms) respect the privacy of our users, employees and website visitors, and are committed to protecting the personal information you may share with us. We also protect our followers, vendors, service providers, partners and others who come in contact with us (these and any others with respect to whom we collect personal data, shall collectively be referred to as “**Users**” or “**you**” or “**Data Subjects**”).
- 1.2 This Privacy Policy explains the types of information we may collect from you or that you may provide when you access or interact with our online platform (the “**Platform**”), or use our mobile application (the “**Application**”), or visit our website at <https://www.mymapleadvisor.com/> (the “**Website**”), or our social media pages (collectively, the “**Services**”). The use of the Services is subject to these Privacy Policy and to our [Terms](#), which forms an integral part thereof.
- 1.3 Your use of our Platform or other Services constitutes your agreement to this Privacy Policy and our data practices, and any other policies made available by us to you. If you do not agree, please notify us in writing, close your Account, and cease all use of the Platform or other Services.
- 1.4 We are transparent about our practices regarding the information we may collect, use, maintain and process and describe our practices in this policy and notice. Please note that our Website may, from time to time, contain links to external sites. We are not responsible for the operation, privacy policies and practices or the content of such sites. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.
- 1.5 Personal Data means information that relates to an identified or identifiable individual (“**Personal Data**”). This can be data which when gathered, consists of any details which are personally identifiable.

2. CATEGORIES OF INFORMATION WE MAY COLLECT & PROCESS

- 2.1 You do not have any legal obligation to provide any information to us, however, we require certain information in order to provide you the Services, including in order to use our Platform. If you choose not to provide us with certain information, then we may not be able to provide you with some or all of the Services, including using our Platform.
- 2.2 We collect data about you when you sign up to our Platform for using our Services, visit our Website or visit our Application.

2.3 We also collect Personal Data when you make a purchase on your cards, pay a bill, request or receive a reimbursement or use other payments functionality.

2.4 The categories of information and data we may collect from, on behalf of, or in connection with our Users:

i. Data we collect about you when you interact with us and our Services:	
a. Personal Data provided consciously and voluntarily by you through your use of the Services:	<p>Contact Data</p> <p>This may include name (first and last), age, email address, marital status, place of work, or other identifier by which you may be contacted online or offline.</p> <p>You may choose to voluntarily provide other information to us that we do not request, such as real estate or other holdings, and, in such instances, you are solely responsible for such information.</p>
	<p>Financial Data, including your bank balance, routing and account numbers, transaction history, tax identification number and related information.</p>
	<p>Billing Data, such as your payment card number, expiration date, and security code.</p>
	<p>Transaction Data, including information associated with your payments and use of your Cards, whether online or in store, such as your Card number, Merchant Category Code (MCC), audit logs, transactions, purchase details, amounts, and locations.</p>
	<p>Content, including content within any messages you send to us (such as when contacting support or asking a question).</p>
b. Personal Data we automatically collect through our Service:	<p>Location Data</p> <p>Related to the geographic location of your laptop, mobile device or other digital device on which the Platform, Website or Application is used (including imprecise location information such as location derived from an IP address or information that indicates a city or postal code level).</p>
	<p>Service Use Data</p> <p>Including information about how much time you spend on particular pages you visit on our Website, Application or Platform, the features you use, your preferences or selections,</p>

	<p>the time of day you browse, and your referring and exiting pages.</p>
<p>c. Tracking technologies we use to automatically collect information through our Service:</p>	<p>Device Data</p> <p>Including information about the type of device or browser you use, your device's operating software, your internet service provider, your device's regional and language settings, and device identifiers such as IP address and Ad ID.</p>
	<p>Log Files, which are files that record events that occur in connection with your use of the Service.</p>
	<p>Cookies, which are small data files stored on your device that act as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate websites and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings.</p>
	<p>Pixels (also known as web beacons), which is code embedded in a website, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities that allow us to track our conversions, bring you advertising, and provide you with additional functionality.</p>
	<p>Device Fingerprinting, which is the process of analyzing and combining sets of data elements from your device's browser, such as JavaScript objects and installed fonts, to create a "fingerprint" of your device and uniquely identify your browser and device.</p>

ii. Data we collect and process from other sources:
Financial Partners, Business-Data providers and Payment Processors in connection with your use of the Services.
Identity Verification Services and Financial Information Providers.
Third Party Integrations , such as with your designated bank, account services, transactional information providers, and other integrations that you connect to your account.
Social Networks and other locations that serve or assist in serving our advertisements.
Joint Marketing, Referrals, and Rewards Partners that we engage for joint marketing activities and also our referrals and rewards program.
Publicly-available sources , including information in the public domain.

We treat the information collected from other sources subject to any laws or contractual obligations applicable to us. In the event we are permitted to process the information for our own purposes, we will process the information in accordance with the practices described in this Privacy Policy.

- 2.5 For purposes of the California Consumer Privacy Act of 2018 ("CCPA"), the table above reflects the data collected in the past 12 months. We do not sell information collected through the Service.

3. THE PURPOSES FOR PERSONAL DATA WE COLLECT & PROCESS:

- i. **To provide you our Services and to allow you to use our Platform, Application or Website.** We use the Personal Data we collect to operate and manage our Service, Application and Website;
- ii. **Administering your account** with our Platform including to identify and authenticate you and notifying you about changes to our Services;
- iii. **Contacting you** for the purpose of providing you with technical assistance and other related information;
- iv. **Security and Fraud Detection.** We use the information we collect to prevent and detect potentially fraudulent or unauthorized transactions, breach of policies or terms, and threats of harm; for security purposes and to identify and authenticate your access to the parts of the facilities;
- v. **Marketing and Advertising.** Contacting you to give you commercial and marketing information about events or promotions or additional Services offered by us, including in

other locations; soliciting feedback in connection with your use of the Services; tracking use of our facilities and Services to enable us to optimize them;

- vi. **To meet our contractual, ethical, and legal obligations.** Regarding our Services, including our Platform, Application or Website, and our obligations to our Partners. For example: to carry out and enforce our rights arising from any contracts entered into between you and us, including for billing and collection; replying to your queries, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity; compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, and for crime prevention and prosecution in so far as it relates to our staff, Users, facilities etc.;
- vii. **Comply with applicable laws.** Comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities and legal processes, such as to respond to subpoenas or requests from government authorities if necessary. To enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding; audit our internal processes for compliance with legal and contractual requirements and internal policies; and
- viii. **Understanding Usage and Improving our Services, Application, and Website.** We use the information we collect to understand how our Users use the Services, Application, and Website, and to improve them. For example, we may use information to provide you with recommendations on how to reduce spending and improve efficiency. We may also improve usability of the Services, Application, and Website by analyzing your interactions with them (such as analyzing how you use tools made available to you or on which links you click).

4. SHARING DATA WITH THIRD PARTIES

We transfer Personal Data to third party service providers.

We transfer Personal Data to the following:

i. Service Providers	We share information with service providers that process information on our behalf. Service providers assist us with services such as payment processing, data analytics, website hosting, and technical support. We contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law or contractual obligation.
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<p>ii. Security and Compelled Disclosure</p>	<p>We share information to comply with the law, regulations, payment network rules, or other legal processes, and where required in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information with regulators, law enforcement, financial services providers, and other authorized third parties as required by law. We will also share information to protect the rights, property, life, health, security and safety of us, the Service, or anyone else.</p>
<p>iii. Referrals and Joint Marketing</p>	<p>We share information with our partners in connection with facilitating referral partnerships or engaging in joint marketing activities. For example, if you were referred to our Service or Product through a referral partner, we share information with our referral partner to calculate the referral fee.</p>
<p>iv. Marketing and Advertising</p>	<p>We share information collected through the Service with vendors or other parties for marketing and advertising related purposes. These parties may act as our service providers, or in certain contexts, independently decide how to process your information. For more information, see the "Analytics and Advertising" section below.</p>
<p>v. Mergers and Acquisition</p>	<p>We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.</p>
<p>vi. At your Request or consent</p>	<p>We share information at your request or direction, such as if you direct us to connect your account to a third-party integration. We may otherwise share information after providing notice to you and obtaining your consent.</p>

5. ANALYTICS AND ADVERTISING

- 5.1 We use analytics services, such as Google Analytics, to help us understand how Users access and use the Services. In addition, we work with agencies, advertisers, ad networks, and other technology services to place advertisements on our behalf on other websites and services. For example, we may place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.
- 5.2 As part of this process, we may incorporate tracking technologies into our own Services (including our Website, Application, and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may

track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you ("**Interest-based Advertising**").

- 5.3 As indicated above, vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.
- 5.4 While you may disable some tracking technologies by blocking cookies in your browser, you may still see advertising as part of a broader marketing campaign. For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics and Interest-based Advertising, please see the "Information Collected through the Service" and "Your Rights and Choices" sections.

6. PRIVACY CHOICES

- 6.1 **Access to account information.** You may update, correct, or delete your account information by accessing the account you have established with us on the Services.
- 6.2 **Opt out of marketing communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.
- 6.3 **Online tracking opt-out.** Blocking cookies in your browser as further detailed in www.allaboutcookies.com or Blocking advertising ID use in your mobile settings; Using privacy plug-ins or browsers or change the settings of Google Analytics. You can also opt out features that let you opt out of use of your information for interest-based advertising such as [Facebook](#) or [Google](#).
- 6.4 **Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals.

7. DATA SUBJECT RIGHTS

- 7.1 **Data subjects have rights, and we respect them.** Data subjects have rights under applicable data protection laws, such as the CCPA, the EU 679/2016 General Data Protection Regulation ("**GDPR**") or other local laws, including, in different circumstances, rights to data portability, rights to access data, rectify data, object to processing, erase data and the right to lodge a complaint. Under the CCPA you also have the right not to receive discriminatory treatment by us for the exercise of any of your rights.
- 7.2 **To exercise any of these rights, please submit a request by sending an email pursuant to the contact details set forth below,** and specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us

verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.

7.3 **Data subject rights cannot be exercised in a manner inconsistent with our rights, our proprietary rights, and third-party rights.** Generally, data subjects have a right to withdraw their consent. Additionally, if a data subject wishes to modify, delete or retrieve their Personal Data, they may do so, where applicable, by contacting us as specified below.

7.4 **Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data,** depending on technical commercial capability. Such information will continue to be used by us. In certain circumstances, such as other contractual or legal obligations, we will need to confirm your choice before we can fully process your request.

8. LAWFUL BASIS FOR PROCESSING

8.1 **Controller-Processor.** We act as a controller with respect to Personal Data collected as you interact with our Service. For the Services, we act as a controller, and in certain instances may act as a processor on behalf of a service provider, which is the controller.

8.2 **Our lawful bases for processing of the Personal Data include** the following: (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

9. INTERNATIONAL DATA TRANSFERS

9.1 We currently store your Personal Data in one of our servers located in the US.

9.2 We may transfer your Personal Data to the United States and other countries which may not have the same data protection laws as the country in which you initially provided the information, but we will protect your Personal Data in accordance with this Privacy Policy, or as otherwise disclosed to you.

9.3 We comply with applicable legal requirements when transferring Personal Data to countries other than the country where you are located. If you are located in the EEA, we will transfer your Personal Data in accordance with adequacy decisions (see list of countries for which the European Commission has issued an adequacy decision [here](#)), standard contractual clauses, and other data transfer mechanisms.

10. DATA RETENTION

10.1 **We retain Personal Data** for the following reasons and for as long as required under applicable laws, to provide the Services, including our Platform, Application or Website; to comply with our legal and other obligations; to resolve disputes and to enforce agreements; to meet any audit, compliance and business best-practices.

- 10.2 **Data that is no longer required to be retained for the aforementioned purposes may be anonymized or deleted.** In the event of termination of the Services, as detailed in our Terms, we will delete the data within ninety (90) days, except where such data must be retained by us, in our judgment, as above. Likewise, some unidentified metadata and statistical information concerning the use of our Services are not subject to the deletion procedures and may be retained by us. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy.

11. SECURITY AND STORAGE OF INFORMATION

- 11.1 We use administrative technical and physical security measures to protect your Personal Data. These measures include computer safeguards and secured files and facilities. We take reasonable steps to securely destroy or permanently de-identify Personal Data when we no longer need it. We will keep your Personal Data only as long as we must deliver our Services, unless we are required by law or regulation or for litigation and regulatory investigations to keep it.
- 11.2 We implement, enforce and maintain security measures, technologies and policies to prevent unauthorized or accidental access to or destruction, loss, modification, use or disclosure of Personal Data. We likewise take steps to monitor compliance on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our Application, Website and Services are safe.
- 11.3 Note, however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

12. MINORS

- 12.1 We do not directly collect or solicit information or data from children under the age of 18, or knowingly allow children under the age of 18 to register for our Platform or Services. If you are under 18, do not register or attempt to register for any of our Service or send any information about yourself to us. If we become aware that we have collected or have been sent Personal Data from a child under the age of 18, we will delete that Personal Data as soon as reasonably practicable without any liability to us. If you believe that we might have collected or been sent information from a minor under the age of 18, please contact us as soon as possible.

13. CHANGES TO THIS PRIVACY POLICY

- 13.1 We may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will be available on our official Website. Changes to this Privacy Policy are effective as of the stated "Last Revised Date" and your continued use of our Website, Platform and Services will constitute your active acceptance of the changes.

14. CONTACT US

If you have any questions or comments concerning this Privacy Policy, you are welcome to contact us at support@mymapleadvisor.com and we will do our best to reply within a reasonable timeframe.

By mail:

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United States of America

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