

## ONE PRIVACY POLICY

*Last updated and effective as of January 14, 2021*

This privacy policy (“**Policy**”) describes how One Finance, Inc. (“**One**”, “**we**”, and “**us**”), collects, uses and shares personal information when using our website (the “**Site**”) and/or the One web or mobile applications(s), (the “**Application**” and together with the Site, the “**Services**”). Please read the following information carefully to understand our views and practices regarding your personal information and how we will treat it.

The Policy posted on our Site and in our Application is always the current effective version. Unless otherwise stated, any modifications to the Policy will take immediate effect when a revised Policy is posted. We reserve the right to modify the Policy at any time, so we encourage you to review it frequently. The “Last Updated” legend above indicates when this Policy was last changed. If we make any material change(s) to the Policy, we will post a notice on our Site and/or in our Application prior to such changes(s) taking effect.

### 1. COLLECTING PERSONAL INFORMATION

We collect information about you in a range of forms, including “personal information” which, either alone or in combination with other information we hold about you, may identify you as an individual, for example your name, address, email and telephone number.

The Services also may allow you to submit personal information about other individuals. For example, the Application may allow you to make a payment to an individual on the contacts list on your mobile device, by selecting and transmitting that individual’s contact information to us through the Application. If you choose to provide us with personal information about another individual, you confirm that you are legally entitled to share that information with us.

We collect information about you in the following ways:

**Information You Provide.** This includes:

- **Information you provide when you register** to use our Services, including your name, email, address, telephone number and other contact information, date of birth, Social Security number, country of citizenship, government issued ID, biometrics, username, and password;
- **Information you provide to prove your eligibility** to use our Services such as financial information including income, bank account number, bank routing information, debit and credit cards details, relevant expiry dates and security code, copies of documents to verify your identity, occupation and income (e.g., passport, driver’s license, utility bill, checks and photographs);
- **Information contained in any comments you post** to our Services;
- **Information you provide when you report a problem** with our Services or when we provide you customer support including via the chat we run on the Services;
- **Information you provide when you correspond with us** by telephone, email, in-app messaging, chat or otherwise; and
- **Information you provide when you apply for employment with us** such as name, address, email address, telephone number, employment history and education information.

**Information We Get from Others.** We may also get information about you from others, for example, if you have agreed to share information with one of our business partners (such as those we partner with to offer additional services such as credit or rewards), sub-contractors who deliver services to us and you to provide our Services, credit reference agencies or fraud prevention agencies.

**Information Automatically Collected.** This includes:

- **Information about you and your computer or mobile device** when you access our Services. When you visit our Services, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, IP address, mobile network information, the website you visited before browsing to our Services, our pages you viewed, how long you spent on one of our pages, access times and information about your use of and actions on our Services;
- **Transaction information** carried out through our Services such as the date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used; and
- **Information stored on your device if you use a mobile or tablet** device to access our Services such as battery percentage, time spent plugged in, accelerometer data, and OS language. If you consent, this information may include contact information from your address book, login information, photos, videos or other digital content. Note that the Application may periodically recollect this information in order to stay up to date. You can review and change permissions for some information our Application have access to by directly visiting your device privacy settings.

We collect some of this information using cookies. Please refer to the sections on Cookies and Pixel Tags below.

**Location information:** If you have location services in the Application switched on, we may track your location using GPS technology and your IP address. We use your information to protect against fraud. You can withdraw your consent at any time by disabling location permission for the Application within your device settings. We may use third-party providers to help provide location-based services through mobile systems and we may make information available to such providers to enable them to provide their location-based services, provided that such third-party providers may use the information only in accordance with this Policy.

## 2. COOKIES

We use cookies to analyze how you use our Site. Please read the [Cookie Policy](#) for more information about cookies.

You have the ability to accept or decline cookies using your web browser settings. If you choose to not accept cookies from our website, you may not be able to take full advantage of its features or to receive some of the services that it provides. To learn more about cookies and your ability to opt-out of certain advertising cookies, please visit the following websites: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org/choices>.

You can understand which third parties have currently enabled cookies for 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.

### 3. PIXEL TAGS

We may also use pixel tags (also called as WebBeacons or ClearGIFs) on our Services to track the actions of users on our Services. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Services, helping us manage our content more effectively. The information we collect using pixel tags is not linked to our users' personal data.

### 4. DO NOT TRACK SIGNALS AND ADS

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 signals.

5. You may see our ads on the internet because we advertise on other online platforms. These online platforms collect information through automated means including data about your visits to our Site. They do this by using cookies, WebBeacons, web server logs, and similar technologies, and they use this information to show you ads that may be tailored to your individual interests. **USING PERSONAL INFORMATION**

We may use the personal and other information we collect from and about you as follows:

- **To operate, maintain, and improve** our Services, products, and services (including to research and develop new products and services; enhance, improve, debug and analyze our products and services; manage our business relationships; and perform accounting, auditing and other functions);
- **To manage your account**, including to communicate with you regarding your account, if you have an account on our Services;
- **To carry out our obligations** arising from any transactions you enter into with us, for example top-ups, bank transfers, electronic money exchanges, ATM withdrawals and card purchases;
- **To operate and administer our rewards program** and other promotions you participate in on our Services;
- **To verify your identity** to protect against fraud, comply with financial crime laws and to confirm your eligibility to use our products and services;
- **To help us better understand** your financial circumstances and behavior so that we may make decisions about how we manage your account;
- **To respond to your comments and questions** and to provide customer service;
- **To send information** including technical notices, updates, security alerts, and support and administrative messages;
- **To send you marketing emails** about upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may unsubscribe from these emails at any time: just follow the unsubscribe instructions contained in any such marketing emails. Please note, even if you unsubscribe from marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you;
- **To link or combine user information** with other personal information;

- **To review and process your employment application** including to communicate with you about your employment application, to assess your qualifications, skills, and interests against our career opportunities, to verify your information and carry out reference checks and/or background checks (where applicable) if you are offered a job and to assist you with obtaining an immigration visa or work permit when requested by you;
- **As we believe necessary or appropriate** (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others; and
- **As described further** in the “SHARING PERSONAL INFORMATION” section below.

**Marketing List.** If you sign up for our Services, we will assume you want us to contact you by post, through the Application, by email, and by telephone with offers and promotions. We may use the information we have collected about you in order to tailor our offers to you. You can adjust your preferences, or tell us you don’t want to hear from us, at any time. You may unsubscribe at any time by clicking on the unsubscribe link included in the email, replying STOP to our text messages, or in the case of push notifications by changing your device settings. We won’t pass your details on to any organizations outside of One or One’s partners for their marketing purposes without your permission.

## 6. SELLING PERSONAL INFORMATION

We do not sell personal information.

## 7. SHARING PERSONAL INFORMATION

We may share personal information with our affiliates, certain third-party service providers, and partners as follows:

- **Third Parties Designated by You.** We may share personal information with third parties where you have provided your consent to do so, such as our co-branded partners
- **Referrals.** We may share personal information with a referring customer (including information about your completed referral status) if you use an existing One customer’s unique referral link to open an account with us.
- **Our Business Partners.** We may share your personal information with companies that we have partnered with to offer or improve products and services for One customers or prospective customers such as joint marketing partners or co-branded card partners.
- **Our Third-Party Service Providers.** We may share personal information with our third-party service providers who provide services such as data analysis and modeling, payment processing, risk detection and prevention, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services. Third-party vendors may collect personal information about your online activities over time and across different websites when you use the website.
- **Corporate Restructuring.** We may share personal information in the event of any proposed reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- **Other Disclosures.** We may share personal information as we believe necessary or appropriate: (a) to comply with applicable laws including disclosing information to fraud prevention agencies; (b) to comply

with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

- **Other Business Activities.** We may share personal information to conduct any other legitimate business activities not otherwise prohibited by law.

We may share anonymized or de-identified aggregated information (this means information that is no longer personal information because it is no longer attributable to a specific individual) with third parties to help deliver products, services, and content that are tailored to the users of our Site and for other purposes.

## **8. THIRD-PARTY WEBSITES**

Our Services may contain links to third party websites and features. This Policy does not cover the privacy practices of such third parties. By including a link to a third-party website, we do not endorse or recommend any products or services offered or information contained at the third-party website. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Such third party may have a privacy policy different from that of ours and the third-party website may provide less security protection than our website. If you decide to visit a third-party website via a link contained on our Services, you do so at your risk.

## **9. INTERNATIONAL DATA TRANSFER**

As we provide an international service, we may need to transfer your personal information outside the United States in order for us to provide our services. For example, if you make an international payment request, we will send funds to the overseas bank.

We may also send your information overseas to comply with legal and regulatory requirements, and also to provide ongoing support services.

We may share your personal information with credit-reference and fraud-prevention agencies outside the United States.

We will take reasonable steps to make sure that your personal information is handled securely and in line with this Policy and data-protection laws.

## **10. SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem through the Application or by the following methods:

Email: [help@onefinance.com](mailto:help@onefinance.com)

Telephone: 1-855-830-6200 (Monday-Friday from 9am to 5pm Pacific Time)

## **11. RETENTION**

We retain information, including personal information, for as long as necessary to achieve the purpose for which it was collected, to fulfill legal or contractual obligations, or for as long as permitted by applicable law. We may retain aggregated data indefinitely. Please see Section 13 of this Policy for more information about retention of information collected pursuant to an application for employment at One.

## **12. CHILDREN AND MINORS**

We make no active effort to collect or retain personal data from children or minors under the age of 18 and we do not wish to receive any such information.

The Children's Online Privacy Protection Act ("COPPA") requires online service providers obtain parental consent before knowingly collecting personal information online from children who are under 13. We do not knowingly collect or solicit personal information from children under 13; if you are a child under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn we have collected personal information from a child under 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [one.privacy@onefinance.com](mailto:one.privacy@onefinance.com).

## **13. WHO MAY USE THE SERVICES**

The Services are designed for users residing in, and are controlled and operated by us from, the United States. By using the Services, you consent to the transfer of your information to the United States, which may have different data protection rules than those of your country.

## **14. EMPLOYMENT APPLICATIONS**

The Site contains an employment page that enables you to apply for employment at One. The functionality of the employment page may be administered by one or more third parties. These third parties collect a range of information, including your contact information, employment history, education and other job qualifications and skills. These third parties may also use cookies and other means of collecting information. One will handle any information collected from such third parties in connection with your employment application in a manner that is consistent with this Policy.

You may choose to provide us with access to certain personal information stored by other external third parties including the career-related social media site LinkedIn. LinkedIn may allow you to connect with and apply for employment at One. One will handle any information collected from such third parties in connection with your employment application in a manner that is consistent with this Policy.

One will use and share this information only for employment purposes such as to communicate with you or evaluate you for a career opportunity, and where sharing is required by law.

We store your personal information consistent with applicable law and keep it as long as is needed to carry out the purposes described in this Policy or as otherwise required by applicable law. If you are not offered a position at One, we will keep your personal information for a reasonable period after confirmation that your employment application was not successful to allow us time to document the reasons for our decision. We may also keep your personal information to consider you for future suitable career opportunities at One.

If you have questions about how we handle your personal information, please visit our [Help Center](#) or contact us at [one.privacy@onefinance.com](mailto:one.privacy@onefinance.com).

## 15. UPDATING YOUR PERSONAL INFORMATION

If you would like to update personal information that you have provided to us through the Services, you may contact us through the Application via chat or through one of the means listed below this section. We need certain information to provide the Services and requests to delete required information may result in our inability to provide the Services.

Email: [help@onefinance.com](mailto:help@onefinance.com)

Telephone: 1-855-830-6200 (Monday-Friday from 9am to 5pm Pacific Time)

## 16. CONTACT INFORMATION

We welcome your comments or questions about this Policy. You may contact us by clicking the “Contact Us” link at the bottom of the page or by the following methods:

Email: [one.privacy@onefinance.com](mailto:one.privacy@onefinance.com)

Mail: **One Finance, Inc.**  
Attn: Privacy  
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