

# Privacy Policy

Effective May 1, 2021

Alt Financial Holdings, Inc., its affiliate, subsidiary and parent companies (collectively referred to as “Altbank”) understands that you care about how we collect, use, and share information when you interact with our websites, social media sites and handles, email, and online services (our “Services”), and we value the trust you place in us. This Privacy Policy explains:

- the types of information we collect through our Services;
- how we use and protect that information;
- the types of information we may share with others and under what circumstances;
- the choices you have regarding our collection, use, and sharing practices; and
- details regarding our use of third-party cookies and other tracking technologies.

We also include specific disclosures for residents of California.

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to non-Altbank websites and mobile applications that may link to the Services or be linked to from the Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

## **Information We Collect**

### Information you give us

Some of our Services may permit you to enter contact information and other information about you. We collect and store any information you enter on our Services. This includes:

- Contact and demographic information.
- Email address information when subscribing to our email newsletters.
- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Information you provide when you complete a survey or participate in a contest or sweepstakes.
- Information you submit to inquire about or apply for a job with us.
- If you contact us, we may keep a record of that correspondence and any contact information provided.

### Information We Collect From Other Sources

We may also receive information about you from other parties:

- Contact information and demographic information.
- Information about your credit history from credit reporting agencies.

- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.

If you decide to invite others to the Services, we will collect the other person’s names, email addresses, and/or phone numbers in order to follow up with that person. You agree that you will obtain the other person’s consent before giving us his or her contact information and that you will not send us the contact information of a minor.

Information We Collect Automatically

When you interact with the Services, we collect certain information about your use of our Services automatically. This includes:

- Analytics about your interaction with our Services, including, traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our Services.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, operating system, and browser type.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.
- Information that you make available to us on a social media platform (such as by clicking on a social media icon linked from our Services), including your account ID or username and other information included in your posts.

*Cookies and Other Tracking Technologies*

We use cookies and other technologies to provide features on our Services. Altbanc relies on partners to provide many features of our sites and Services using data about your use of Altbanc and other sites. We also partner with other companies that use these technologies to collect information about your use of our Services and your interaction with advertisements served on our behalf.

The types of cookies and tracking technologies our partners use can be categorized as:

- Analytics: These technologies help us to understand how visitors interact with our Services by collecting and reporting information about how you and your device interact with the Services.
- Personalized Advertising: These technologies allow us to serve relevant advertising to you on other websites or apps.
- Social Media: These technologies allow us to provide a user experience that is integrated with various social media platforms.

Below is a list of these partners with links to more information about their use of your information and any options they may make available regarding tracking.

Category	Partner	Further Information
Analytics	Google	<a href="#">How Google uses information from sites or apps that use our services</a>

Advertising	Facebook	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
Analytics	Twitter	<a href="https://help.twitter.com/en/rules-and-policies/twitter-cookies">https://help.twitter.com/en/rules-and-policies/twitter-cookies</a>

### Combination of Information

We may combine information from the Services together and with other information we obtain from our business records.

### How We Use Your Information

We may use the information we collect about you for the following purposes:

- To provide you with our products and services, including to take steps to enter into a contract for sale or for services, process payments, fulfill orders send service communications, and conduct general business operations such as accounting, recordkeeping, and audits.
- To give recommendations, deliver personalized marketing and advertising to you about our products and services, and to enable additional features on our Services and to provide you with a personalized service.
- To provide you with the best service and improve and grow our business, including to understand how our Services are being used, understand our customer base and purchasing trend, understand the effectiveness of our marketing, and develop new products and services.
- To deliver tailored advertising on our Services based on your preferences or interests across services and devices and measure the effectiveness of ads.
- To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with legal requirements regarding the provision of products and services.

### How We Secure the Information We Collect From or About You

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

### How We Share Your Information

We share information as follows.

Service Providers: We engage vendors to perform functions on our behalf, and they may receive information about you. These vendors are obligated by contract to use information that we share only for the purpose of providing these services. The business functions our vendors support include: billing and collection; auditing and accounting; professional services; analytics services; security; IT; and marketing emails.

Social Media Platforms: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.

Online Advertising Partners: We partner with companies that assist us in advertising about our Services to others who may be interested in the Services. These companies may use tracking technologies on our website to collect or receive information from the Services and elsewhere on the internet and then use that information to measure and target ads.

Corporate Affiliates: We share data with other members of our group of companies.

Business Partners: We share data with Affiliates and business partners who may sell services of interest to you.

Government Entities: We may also share data when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our Clients, or other individuals.

Potential Purchasers of Our Business: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

We may use and share at our discretion data that has been aggregated (information that has been compiled into summaries) or de-identified (information that has been stripped of all unique identifiers such that it cannot be linked to a particular individual).

### **Cross-border Transfer of Data**

If you use our Services outside of the United States, you understand that we may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law. By using the Services, you consent to the collection, international transfer, storage, and processing of your data.

### **Your Options and Rights Regarding Your Information**

Your Account: Please log in to your Altbank account to update your contact information.

Email Unsubscribe: If at any time you would like to unsubscribe from receiving future emails, you can click the unsubscribe link at the bottom of any email newsletter, or email us [admin@altbank.us](mailto:admin@altbank.us) and we will promptly remove you from all correspondence.

Ad Choices: You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#). Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting out of advertising networks services does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt-out preferences.

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed. You may also be able to opt out of or block tracking by interacting directly with the other companies who conduct tracking through our Services.

Your browser or device may include “Do Not Track” functionality. We are not able to receive or honor signals or preferences from your web browser at this time, such as Do Not Track or private browsing mode. Instead, you can use the range of other tools to control information collection and use, including the cookie, analytics, and advertising controls described above.

## **Your California Privacy Rights**

### **California Shine the Light**

Residents of the State of California have the right to request information from Altbank regarding other companies to whom the company has disclosed certain categories of information during the preceding year for those companies’ direct marketing purposes. If you are a California resident and would like to make such a request, please email [admin@altbank.us](mailto:admin@altbank.us) or write to us at Altbank, 221 River Street 9th Floor, Hoboken, NJ 07030.

### **California Consumer Privacy Act**

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of information about them, as well as rights to know/access, delete, and limit sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights

To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

### **Notice at Collection Regarding the Categories of Personal Information Collected**

You have the right to receive notice of the categories of personal information we collect, and the purposes for which we use personal information. You also have the right to know about the sources of the personal information and to whom it is disclosed or sold. The categories we use below to describe personal information are those enumerated in the CCPA.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” information are third parties. Under the CCPA, a business “sells” personal information when it discloses it to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

We collect this personal information from the sources described in the Information We Collect section above for the purposes described in the How We Use Your Information section, also above.

<b>Information Type</b>	<b>Collected</b>	<b>Disclosed to?</b>	<b>Sold to?</b>
<b><i>Personal Identifiers</i></b>	<ul style="list-style-type: none"> <li>• Contact information (name, phone number, email address, contact address)</li> <li>• Unique identifiers associated with your user name when you create an account</li> <li>• Social media handles and account information</li> <li>• Unique identifiers (such as those assigned in cookies)</li> <li>• Social Security and Driver’s License Numbers</li> <li>• Passport Book</li> <li>• Green Card</li> <li>• Permanent Residence Card</li> <li>• Driver’s License</li> <li>• State Identification Card</li> </ul>	Service Providers	Advertising partners
<b><i>Payment Information</i></b>	<ul style="list-style-type: none"> <li>• Payment card data</li> <li>• Bank account information</li> </ul>	Service Providers	Not sold
<b><i>Protected Classifications</i></b>	<ul style="list-style-type: none"> <li>• Age</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Race</li> <li>• Ethnic origin</li> <li>• Disability status</li> <li>• Sexual orient</li> </ul>	Service Providers	Not sold
<b><i>Commercial Information</i></b>	<ul style="list-style-type: none"> <li>• Transaction information</li> <li>• Billing and payment records</li> </ul>	Service Providers	Not sold
<b><i>Geolocation Information</i></b>	<ul style="list-style-type: none"> <li>• Coarse information (e.g., ZIP code, IP address)</li> </ul>	Service Providers	Advertising partners
<b><i>Internet or Electronic Network Activity Information</i></b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Information provided in URL string (e.g., search keywords)</li> <li>• Cookie or tracking pixel information</li> <li>• Information about your interaction with our website, app, or email correspondence</li> </ul>	Service Providers	Advertising partners
<b><i>Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information</i></b>	<ul style="list-style-type: none"> <li>• Call recording (e.g., customer service calls)</li> </ul>	Service Providers	Not sold
<b><i>Professional or Employment-Related Information</i></b>	<ul style="list-style-type: none"> <li>• Current employer</li> <li>• Employment history</li> </ul>	Service Providers	Not sold
<b><i>Education Information</i></b>	<ul style="list-style-type: none"> <li>• Education history</li> <li>• Level of education</li> </ul>	Service Providers	Not sold

We do not collect any medical or health information about you, biometric information, your precise location data, or your image or any thermal, olfactory, or similar information.

Personal information may be disclosed in additional, more limited circumstances, as described in How We Share Your Information above.

### **Right to Opt Out of Sale of Personal Information to Third Parties**

You have the right to opt out of any sale of your personal information by Altbank to third parties. However, we do not engage in any disclosures that would be considered sales of data under the CCPA.

### **Right to Know and Request Access to and Deletion of Personal Information**

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

#### How to Submit an Access or Deletion Request

You may submit a request to exercise your rights to know/access or delete your personal information through the following means:

- (1) By filling out a Consumer Data Request Form available [here](#).
- (2) By calling us at (551) 336-6136

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

#### Verification Procedures

In order to process your request to know/access or delete personal information we collect, disclose, or sell, we must verify your request. We verify your identity by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email, or telephone account stated in the request.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

### **Special Information for Job Applicants**

When you apply for a job with Altbank we collect certain information about you as outlined in this Policy. Information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference. In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Our full applicant policy is available here.

**Special Information for Nevada Residents**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. At this time, Altbank does not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please email Customer Service at [admin@altbank.us](mailto:admin@altbank.us).

**Changes to This Policy**

We may make changes to this Policy from time to time. The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Policy.

For questions about our privacy practices, contact us at:

Alt Financial Holdings, Inc.  
221 River Street 9th Floor,  
Hoboken, NJ 07030  
(551) 336-6136  
Email: [admin@altbank.us](mailto:admin@altbank.us)