



This privacy policy (the "Privacy Policy") relates to the information collection and use practices of Bumped, Inc. and Bumped Financial LLC (collectively, "Bumped," "we," "our," or "us") in connection with our proprietary consumer loyalty reward program (the "Reward Program") offered through our website(s) and mobile application(s) (collectively, the "Platform").

By visiting using our Platform, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

## The Information We Collect and Receive

In the course of operating the Platform and the Rewards Program, we will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

### 1. Personal Information

When you register for the Rewards Program, or contact us, you will be required to provide us with personal information about yourself (collectively, the "Personal Information"). Such Personal Information may include your name, address, e-mail address, phone number, date of birth, and social security number. We do not collect any Personal Information from you when you visit the Platform unless you provide us with the Personal Information voluntarily.

### 2. Payment Information

In order to register for the Rewards Program, you will be required to link a payment card or cards to your account by providing our third-party vendor ("Payment Vendor") with a debit card number, credit card number, and/or similar information (collectively, the "Payment Information"). Such Payment Information is collected by our Payment Vendor pursuant to the terms and conditions of its privacy policy, and we are provided with an encrypted token by such vendor in connection therewith. We do not obtain access to the Payment Information itself. By using the Platform, you acknowledge and agree that if and to the extent your Payment Information, Personal Information, Transaction Information (as defined below), or any other information is collected by or transferred to Plaid Technologies, Inc. ("Plaid"), as a Bumped Payment Vendor, you acknowledge and agree that the terms and conditions of Plaid's privacy policy (found here: <https://plaid.com/legal/#privacy-policy>) will govern Plaid's use of such information, and that you expressly agree to the terms and conditions of Plaid's privacy policy. You hereby expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services to you in connection with your use of the Platform.

### 3. Transaction Information



If you are enrolled in the Rewards Program, when you make a purchase for goods and/or services at any of the Merchants' (as defined below) stores (including physical and online sales channels) (each, a "Purchase"), we will collect, or Plaid will collect on our behalf, information about your Purchase, including the date of the transaction, the dollar amount spent on such Purchase, the Merchant name, the transaction location, the transaction categorization, pending status, and related information about the Purchase (the "Transaction Information"). "Merchants" are participating merchants in the Rewards Program.

#### 4. Securities Information

If you are enrolled in the Rewards Program, when you earn rewards in the form of securities, we, and our clearing firm partner, will collect information about these securities transactions. In addition, if you sell any of the securities you've earned through the Rewards Program via the Platform, we and our clearing firm will collect information about such sales. The information we collect under this section is referred to as "Securities Information."

Transaction Information may also include Securities Information.

#### 5. Geolocational Information

Certain features and functionalities of the Platform may be based on your location. In order to provide these features and functionalities while you are using a mobile device, we may, with your consent, automatically collect geolocational information from your mobile device or wireless carrier and/or certain third-party service providers. Such information is collectively called the "Geolocational Information." Collection of such Geolocational Information occurs only when the Platform is running on your mobile device. You may decline to allow us to collect such Geolocational Information, in which case we may not be able to provide certain features or functionalities to you.

#### 6. Other Information

We may collect additional information (collectively, the "Other Information"). Such Other Information may include:

a. From You. Additional information about yourself that you voluntarily provide to us, such as household income range, personal interests, and your product and service preferences.

b. From Your Activity. Additional information that we automatically collect when you use the Platform, including, without limitation:

- IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Browser type and language;

- Referring and exit pages and URLs;
- Date and time;
- Details regarding your activity on the Platform, such as search queries, amount of time spent viewing pages, and other performance and usage data.

c. **About Your Device.**

- Type of device;
- Advertising Identifier (“IDFA” or “AdID”);
- Operating system and version (e.g., iOS, Android or Windows);
- Carrier;
- Geo-location; and
- Network type (WiFi, 3G, 4G, LTE).

d. **From Cookies.** We may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your computer until you delete them and other technologies to help us collect data and to enhance your experience with the Platform. Cookies are small text files a website can use to recognize a repeat visitor to the website. We may use cookies for various purposes, including to:

- authenticate users;
- personalize your experience;
- analyze which portions of the Platform are visited or used most frequently; and
- measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in your browser, you can opt out by setting your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. If you choose to disable cookies in your browser, you can still use the Platform, although your ability to use some of the features may be affected.

e. **Third-Party Analytics.** We use third-party analytics services (such as Google Analytics or Segment) to evaluate your use of the Platform, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Platform and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data and, in some cases, connect such data with other data held by our, or third party, environments. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on these third parties, including how to opt out from certain data collection, please visit the sites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Platform.



For Google Analytics, please visit <https://www.google.com/analytics>  
For Segment, please visit <https://segment.com>

f. **From Other Sources.** Additional information that we collect or receive from third-party sources in accordance with their privacy policies.

### The Information Collected by or Through Third-Party Advertising Companies

We may share Other Information about your activity on the Platform with third parties, such as Facebook via the Facebook Connect functionality, for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on the Platform and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third-party advertisers, to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. Neither we nor any third party acting on our behalf employs behavioral advertising or retargeting in connection with users whom we know to be under 13 years old.

### How We Use and Share the Information

We use the Personal Information, Payment Information, Transaction Information, Securities Information, Geolocational Information, and Other Information (collectively, "Information") to provide you the Rewards Program and other services available on the Platform, solicit your feedback, and to improve our services to you. Also, we may share Information as described below, to the extent not prohibited by applicable federal and state laws, rules, and regulations.

- In an ongoing effort to better understand our users and our Platform, we might analyze the Information in aggregate form in order to operate, maintain, manage, and improve the Platform. This aggregate information does not identify you personally. This aggregate information does not identify you personally. We may share and/or license this aggregate data with our affiliates, agents, and business partners, and other third parties, including, without limitation, Merchants. We may also disclose aggregated user statistics in order to describe our products and Platform to current and prospective business partners and to other third parties for other lawful purposes.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include companies and individuals providing marketing assistance, information technology support, ID verification, purchasing and selling securities, maintaining database, and customer service. These other companies, including, without limitation, Plaid, will have access to the Information only as necessary to perform their functions and to the extent permitted by law. Our contracts with all



such third parties require them to protect the confidentiality of the Information we provide to them.

- We may share your Transaction Information with Merchants for the limited purpose of comparing such information with the Merchant's internal data in order to verify the authenticity of Purchase transactions and detect fraudulent transactions, as permitted by law.
- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose the Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of Bumped, our users, or others.

If Bumped intends on using your Information in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Information is collected.

### How We Protect Your Information

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We maintain physical, electronic, and procedural safeguards that comply with applicable state and federal laws and regulations to guard non-public personal financial information from unauthorized access, use, and disclosure. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information you supply will not be intercepted while being transmitted to and from us over the Internet.

### Retention of Your Information

We will retain your Information for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, is subsequently authorized, or as otherwise required or permitted by law. We will also retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



## **Accessing and Modifying Personal Information and Communication Preferences**

If you have registered for the Platform, you may access, review, and make changes to your Personal Information by following the instructions found on the Platform. In addition, you may manage your receipt of marketing communications by clicking on the “unsubscribe” link located on the bottom of any Bumped marketing email. Registered users cannot opt out of receiving administrative or transactional e-mails related to their account. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our databases.

## **Important Notice to Non-U.S. Residents**

The Platform and our servers are operated in the United States and elsewhere. Please be aware that your Information may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your country of origin. If you are located outside the United States and choose to use the Platform, you do so at your own risk.

## **Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Platform. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Platform. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us and we will endeavor to delete that information from our databases.

## **Your California Privacy Rights**

Under California Civil Code Section 1798.83, California residents who have an established business relationship with Bumped may choose to opt out of our sharing your Personal Information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your Personal Information to third parties for the direct marketing purposes, please send an e-mail to [support@bumped.com](mailto:support@bumped.com).

In addition, Bumped does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

## **External Websites**



The Platform may contain links to third-party websites. Bumped has no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Platform as soon as they go into effect. By accessing visiting the Website or using the Platform after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Privacy Policy, please e-mail us at [support@bumped.com](mailto:support@bumped.com).