

## SpEnDebt Privacy Policy

**Effective Date:** 6/12/17

SpEnDebt, LLC (“SpEnDebt”, “we”, “us”, or “our”) recognizes the importance of privacy. In this Privacy Policy, we describe how we collect, use, and disclose information that we obtain about users of our website [www.spendebt.com](http://www.spendebt.com) (the “Site”) and the services available through our Site (collectively, the Site and services are the “Services”).

By using any of our Services, you agree that any information that we collect from or about you through our Services, including personal information, anonymous information, and aggregate information, will be handled as described in this Privacy Policy.

Your use of our Services, and any dispute over privacy, is subject to this Privacy Policy and any other applicable agreements between you and SpEnDebt, such as our Terms of Use including any applicable limitations on damages and the resolution of disputes.

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### **Information We Collect**

We collect information about you directly from you, from third parties, and automatically through your use of our Services. We may combine information collected from or about you from these various sources.

***Information We Collect Directly from You.*** We collect information about you directly from you. For example, if you create an account with us, we will collect your name, phone number, email address, bank account information, debt account information, prepaid card information, or other payment-related information. We may also collect other information, such as driver’s license number, passport information, and other governmental identification information. We will also collect any other information that you provide to us through our Services. For example, we will collect your email address if you sign up for our newsletter through our Site.

***Information We Collect About You from Third Parties.*** We may also collect information about you from third parties. For example, if a family member or friend creates an account to help you pay off your debt, we will collect your debt account information from that family member or friend. In addition, if you log into our Services through a social networking accounts, such as Facebook or Google, we obtain your name and username and any other publicly available profile information.

***Information We Collect Automatically Through Our Services.*** We automatically collect information about you through your use of our Services, including, without limitation, your IP address, location, browser type, device type, operating system and version, domain name, the website that led you to our Services, the

website to which you go after leaving our Services, the dates and times you access our Services, and the links you click and your other activities within the Services. In addition, we will collect information about spending and paying habits, such as the frequency of your payments and the amounts that you spend. Please see our [Cookies and Other Tracking Mechanisms](#) section below for more information about how we automatically collect information about your use of our Services. We may combine information we collect automatically through our Services with information we collect directly from or from third parties.

## How We Use Your Information

We may use your information, including personal information, for the following purposes:

***Providing and Improving Our Services.*** To provide and maintain our Services; to improve our Services; to develop new features, products, or services; to perform technical operations, such as updating software; to authenticate users; to facilitate payments; and for other customer service and support purposes.

***Marketing and Communications.*** To communicate with you about your account and use of our Services, including to send you product updates; to respond to your inquiries; to provide you with news and newsletters, special offers, promotions, and other information we think may interest you; and for other informational, marketing, or promotional purposes. Our communications with you may include communications via email. Please see our section regarding [Your Choices](#) for more information about how to change your communications preferences.

***Research and Analytics.*** To analyze how you interact with our Services; to monitor and analyze usage and activity trends; and for other research, analytical, and statistical purposes.

***Protecting Rights and Interests.*** To protect the safety, rights, property, or security of SpenDebt, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity which SpenDebt, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Privacy Policy or our Terms of Use.

***Legal Compliance.*** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

## How We Disclose Your Information

We may disclose your information, including personal information, as described to you at the time of collection or disclosure or as follows:

***Affiliates.*** We may disclose your information to current or future affiliates or subsidiaries for research, marketing, and other purposes consistent with this Privacy Policy.

***Service Providers.*** We may disclose your information to our vendors, service providers, agents, consultants, or others who perform functions on our behalf. For example, we may disclose your information to third-party service providers to process payments on our behalf.

***Other Unaffiliated Third Parties.*** We may disclose your information to third parties, including so that those third parties may send marketing information to you.

***Business Transfers.*** We may disclose your information to another entity in connection with, including during negotiations of, an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or as part of any other similar business transfer.

**Protecting Rights and Interests.** We may disclose your information to protect the safety, rights, property, or security of SpenDebt, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity which SpenDebt, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Privacy Policy or our Terms of Use

**Legal Compliance.** We may disclose your information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; in response to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a government official.

**Aggregate and De-Identified Information.** We may disclose aggregate, anonymous, or de-identified information about users for marketing, advertising, research, compliance, or other purposes. For example, we may share aggregate information with retailers so they can understand the spending habits of their customers.

## **Cookies and Other Tracking Mechanisms**

We and our service providers use cookies and other tracking mechanisms to track information about your use of our Services. We or our service providers may combine this information with other information, including personal information, we collect about you.

**Cookies.** Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster log-in process or to allow us to track your activities while using our Services. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Services who disable cookies will be able to browse certain areas of the Services, but some features may not function (*e.g.*, you may not be able to stay logged into your account).

**Clear GIFs, pixel tags and other technologies.** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track the activities users of our Services, help us manage content, and compile statistics about usage of our Services. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

## **Third-Party Analytics**

We may use third-party analytics companies to evaluate use of our Services. We or our service providers use these tools to help us understand use of, and to improve, our Services, performance, and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or local storage objects ("LSOs"), to perform their services.

## **Do Not Track Disclosure**

Our Services do not respond to Do Not Track signals. For more information about Do Not Track signals, please click [here](#). You may, however, disable certain tracking as discussed in the [Cookies and Other Tracking Mechanisms](#) section above (*e.g.*, by disabling cookies).

## Third-Party Links

Our Services may contain links to third-party websites and applications. Any access to and use of such linked websites and applications is not governed by this Privacy Policy but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third-party websites or applications.

We use third parties to access your banking information with your online banking login. We do not store any of your bank login information or bank account information on our servers. Any information regarding linking your account via these third parties, such as login information, transaction information, and balance information is covered under their privacy policies (please see [Plaid's Privacy Policy](#) and [Stripe's Privacy Policy](#)). By using our Services, you agree that your bank account information will be handled in accordance with the privacy policies of such third parties.

## Security

We have taken steps to help protect the personal information we collect. However, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your device and account by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

## Your Choices

***Accessing, Modifying, or Deleting Your Personal Information.*** You may access, modify, or delete the personal information that you have provided to us by logging into your account settings or emailing us at [info@spendebt.com](mailto:info@spendebt.com) what you would like updated. Please note that we may retain certain information about you as required by law or as permitted by law for legitimate business purposes. For example, if you request that we delete your information but we believe that you have violated our Terms of Use we may retain information about you in order to attempt to resolve the issue before deleting it.

***Opting out of Marketing Emails.*** We may send periodic promotional emails to you. You may opt out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to ten (10) business days for us to process opt-out requests. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Services you have requested or received from us.

## Your California Privacy Rights

If you are a California resident then under Cal. Civ. Code § 1798.83 you may request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at the contact information provided below. In your request, please attest to the fact that you are a California resident and provide a current California address for your response.

## Children

Our Services are not targeted to children under thirteen (13) years of age and we do not knowingly collect personal information from children under 13. If we discover that a child under 13 has provided us with personal information, we will promptly delete such personal information from our systems.

## Contact Us

If you have questions about this Privacy Policy or the privacy aspects of our Services, please contact us at [info@spendebt.com](mailto:info@spendebt.com).

## **Changes to this Privacy Policy**

This Privacy Policy is current as of the Effective Date set forth above. We may change this Privacy Policy from time to time, so please be sure to check back periodically. We will post any changes, including any material changes, to this Privacy Policy on our Site.