

SPAVE®

Privacy Policy

Last Updated: October 14, 2022

Spave LLC, (“Spave,” “us,” “we,” or our “Company”), has developed this Privacy Policy to demonstrate our commitment to protecting your privacy. This Privacy Policy is intended to describe for you, as a user of the Spave application (the “App”), how we collect your information, how we use it, with whom it may be shared, and your choices about such uses and disclosures. It also covers your access to the website we maintain at <https://www.spave.io> (the “Website”).

We encourage you to read this Privacy Policy carefully before using our App or services, or otherwise transacting business with us. By using our App or accessing the Website, you are accepting the practices described in this Privacy Policy. If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

What We Believe

You own your data and have the right to control it. Our mission is to provide you, our customer, with the tools and information you need to make informed choices about how we collect, store and use your data.

How We Use The Information We Collect

In general. We may use information that we collect about you to:

- deliver the products and services that you have requested;
- manage your account and provide you with customer support;
- send administrative information to you, such as information regarding the App and changes to our terms, including through push notifications and text messages;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services and content offered by others;
- communicate with you by email, postal mail, telephone and/or mobile devices, or send newsletters or other information about events, products or services that could be of interest to you;
- carry out ordinary business purposes, such as performing data analysis and audits; ongoing fraud monitoring and prevention; developing new products; enhancing, improving or modifying our products and services; identifying usage trends; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities;
- enforce our terms and conditions;
- comply with legal obligations;
- provide you with receipts for your donations, and similar tax documentation; and
- perform any other functions described to you at the time of collection.

Payment and Financial information. We may use your financial information and stored payment methods to process payment for any services ordered through the App, including

membership fees, and other programs in which you elect to participate, to pre-qualify you for credit card use, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business. We also use your information to move money between your banks, credit unions and other third parties, at your request.

Job Applicants. If your personal information is submitted through our Website when applying for a position with our company, the information will be used solely in connection with considering and acting upon your application. We may retain your personal information for a period of time, but only for the purpose of considering your application for current or future available positions or meeting our regulatory obligations.

Information We Collect About You

When you use the App or access the Website, we collect information from and about you, your devices, and your interactions with our services. Some of this information identifies you directly or can be used to identify you when combined with other data. For example, we may collect the following:

Voluntary Information. We may collect and store any personal information you enter into the Website or App. This includes identifying information such as your name, address, e-mail address, telephone number, payment card information, financial information and other personally identifiable information. You will generally provide this information to us when you create an account on our App.

Location Information. Our App may collect and process location information, if you allow it. If location services are enabled, we collect your device's precise location when you open and/or use the App, as you have authorized. This enables us to serve up relevant data based on your location, thereby enhancing your user experience.

Usage Information. We collect information about your use of the Website and the App, including the webpages and sections of the App you access, the content you view, and the dates and times of access. This information could include the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to the Website. We also collect information about the computer or mobile device you use to access our services, such as the hardware model, operating system and version, unique device identifiers, mobile network information, and browsing behavior. All of this enables us to ensure the App performs adequately based on your device type, as well as to understand from where our users are discovering us and they engage with our services.

You may adjust settings on your mobile device and mobile browser regarding cookies and sharing of certain information, such as your mobile device model or the language your mobile device uses, by adjusting the privacy and security settings on your mobile device. Please refer to the instructions provided by your mobile service provider or mobile device manufacturer. If you enable location services on your mobile device, we may collect the location of your device as described above. You should be aware, however, that these changes may negatively impact the performance of the App and your overall user experience.

Communications. We collect information about any phone, text message, e-mail, or online messaging function you use to communicate with us. This may include, in addition to the text of such communications, the participants' phone numbers, the date and time, and the contents of SMS messages. All communications (in any form) between you and our customer service team may be recorded or monitored for quality assurance and customer

service purposes.

Collection of Information by Third-Party Services

Some services we provide you through the App require collection of your information directly by third parties. Third parties to whom we may disclose personal information generally have their own privacy policies. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the website of those third parties. Our relevant third-party service providers include the following:

- Dwolla. Dwolla is an online payments system that we may use to verify your identity, process your payments to Spave or its partners, or move money (at your discretion) between financial accounts. By using our services, you agree to your personal and financial information being transferred, stored, and processed by Dwolla in accordance with its Privacy Policy, available at <https://www.dwolla.com/legal/privacy/>.
- Plaid. We use technology provided by Plaid, Inc. to link your bank accounts and gather transactions and balance data from your financial institutions. By using our service, you grant Spave and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institutions. You agree to your personal and financial information being transferred, stored, and processed by Dwolla in accordance with its Privacy Policy, available at <https://plaid.com/legal>.
- MakeMyDonation. MakeMyDonation is a donation processing service that we use to ensure that donations made by our users are 100% tax-deductible. MakeMyDonation is, essentially, an intermediary between your financial institution and the charities you select. As such, by setting up your account to provide for charitable contributions, you grant us the right to share your information with MakeMyDonation. You would also authorize MakeMyDonation to use your personal information to carry out charitable contributions and provide you with receipts and similar tax documentation, in accordance with its Privacy Policy, available at <https://makemydonation.org/privacy-policy/>.

There are some places in our App and on the Website where you may access other websites that do not operate under this Privacy Policy. You may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and in some instances provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the “privacy” link typically located at the bottom of the webpage you are visiting.

Tracking

We use various technologies to collect information automatically when you access the App or our website, including cookies, web beacons and other similar technologies. A cookie is a small text file that is stored in a user’s computer for record keeping purposes. For example, when you access or sign into our Website, we may record your user or member ID, the name on your user or member account, your device ID, or other identifying information in the cookie file on your computer. We also may record your password in this cookie file, if you

indicated that you would like your password saved for automatic sign-in. For security purposes, we will encrypt any usernames, passwords, and other user or member account-related data that we store in such cookies. In the case of sites and services that do not use a user or member ID, the cookie will contain a unique identifier. You may delete or decline cookies by changing your browser settings. (Click “Help” in the toolbar of most browsers for instructions.) If you do so, some of the features and services of our Website may not function properly.

The Website may also include web beacons or pixels, which are electronic files to count users who have visited that page, to track activity over time and across different websites, to determine users’ interactions with emails we send, to identify certain cookies on the computer or other electronic device accessing that page, or to collect other related information, and this information may be associated with your unique browser, device identifier, or Internet Protocol address. We may, for example, implement a pixel on the Website where you view a certain advertisement so that we can track whether you visit a website associated with that advertisement at a later time.

Similarly, third parties may use cookies to deliver advertisements to you based on your visit to the Website or other websites. You may opt-out of cookie tracking and analysis from any of these service providers and advertising networks, but doing so could impede your experience with the App.

How We Share and Disclose Your Information

We do not share your personal information with third parties except as indicated below, or when we inform you and give you an opportunity to opt out of having your personal information shared. We will only share personal information that you provide to us in the following circumstances:

- With your consent. This happens when you submit service requests through the App. For example, if you direct that we transfer funds to bank or credit union accounts, charities, or other third parties, then you are authorizing us to share necessary and relevant personal data. Such third parties may use and disclose your information in accordance with their own privacy policies.
- Partners with whom we conduct business. When we partner with other businesses to offer products and services, we may share information with those business partners only as needed to provide those products and services and only subject to the terms of this Privacy Policy. However, such partners may also independently collect your information. See “Collection of Information by Third Party Services” for additional information.
- Other situations. We also may disclose your information:
 - In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

- When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our partners, our employees, or others; or to enforce our website terms and conditions or other agreements or policies.
 - In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.
- Aggregated Information. We may share aggregated and non-personal information we collect under any of the above circumstances. We may also share aggregated information with third parties, including advisors, partners and investors for the purpose of conducting general business analysis or marketing to our users generally.

Email and SMS Management

You may receive email or text messages from Spave for a variety of reasons; for example, if you took an action through the Services, you signed up for a regular report, or we are making you aware of system updates. If you have an account with Spave, you can manage your communication preferences through your account settings. Also, you can manage your receipt of some types of communication by following the instructions included in the emails or text messages we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with important transactional or administrative information.

How you can access your information

If you have an account with us, you can review and update your personal information online by signing into your account through the App. You can also review and update your personal information by contacting us. More information about how to contact us is provided below.

You may disable your account by deactivating your account through the App or contacting us at Support@spave.io. After deactivation, you will not be able to sign into our App or Website or access any of your personal information or transaction history. Even after termination, we may still retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, collect any fees owed, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our systems or our users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies. All of the foregoing is also subject to our obligation to retain certain information on you and your transactions for regulatory purposes.

How we protect your personal information

Protecting your personal information is important to us, and we take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. For example:

- We employ a sophisticated network firewall, web application firewall, and DDoS protection layer designed to keep intruders out.
- We comply with the highest design standards and best practices of our cloud service providers.
- Only authorized employees and contractors are permitted to access personal information, and they do so only for permitted business functions.
- Stored data is protected by encryption at rest and sensitive data by application-level encryption. We do not store user's bank credentials.
- We use industry leading solutions around intrusion detection systems, file integrity monitoring, application control, application and audit log aggregation and automated patching

We want you to feel confident using our App and the Website to transact business. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches, or other communications will always remain secure. Please refer to the Federal Trade Commission's website at <https://www.consumer.ftc.gov/features/feature-0014-identity-theft> for information about how to protect yourself against identity theft.

Changes to this Privacy Policy

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. If we make any material changes in the way we collect, use, and/or share your personal information, we will notify you by sending an email to the email address you most recently provided us in your account, profile or registration (unless we do not have such an email address). We recommend that you check our Website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

Children Under 13

The App, Website and our services are not intended for children under 13 years of age and we do not knowingly collect personal information from children under 13. No one under age 13 may provide any information to us in any manner. If we learn we have collected or received personal information from a child under 13, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at Support@spave.io.

Your California Privacy Rights

The California Consumer Privacy Act provides some California residents with the additional rights listed below. To exercise these rights, please contact as provided for below under "How to Contact Us."

Right to Know. You have the right to know and see what data we have collected about you over the past 12 months, including:

- The categories of personal information we have collected about you;

- The categories of sources from which the personal information is collected;
- The business or commercial purpose for collecting your personal information;
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you.

Right to Delete. You have the right to request that we delete any personal information we have collected from you, unless we need the information to:

- Complete our pending transactions with you;
- Provide you requested Services;
- Protect your security and prosecute those responsible for breaching it; or
- Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

Other Rights. You can request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above. Our goal is to respond to all requests for information, access or deletion within 45 days of receipt.

Transfer of Information to the United States

Spave is based in the United States and you acknowledge that the information we collect is governed by U.S. law. By accessing or using the App or our services or otherwise providing information to us, you consent to the processing, transfer, and storage of information in and to the United States, where you may not have the same rights and protections as you do under local law.

How to Contact Us

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by email or postal mail as follows:

Spave, LLC 3777 West Road, East Lansing, MI 48823, Attn: Privacy Coordinator, or by email at Support@spave.io.