

# Privacy Policy

## **Evolve Bank & Trust Services Governed by Separate Bank Privacy Policy**

The Gabriel Money platform may be used to obtain “Bank Services” as described in the Gabriel Money Terms and Conditions. The collection, use, and disclosure of your personal information related to Evolve Bank & Trust Services is governed by the Evolve Bank & Trust’s privacy policy available at <https://www.getevolved.com/privacy-policy/>, as modified or supplemented from time to time. By accessing Evolve Bank & Trust Services through us, you agree that we may share your information with the Bank and the Bank may share your information with us. This includes your personal identification information, account balances, transaction data, and other information needed to provide Bank Services. To the extent we are permitted to use that information in connection with “Non-Bank Services” as described in the Gabriel Money Terms and Conditions, we will do so in accordance with this Gabriel Money Privacy Policy. In all other instances, the Evolve Bank & Trust’s privacy policy shall control over this Gabriel Money Privacy Policy, but only with respect to information collected, obtained, or created in connection with the Bank Services.

Your privacy is important to us. It is Gabriel Money policy to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our website, <https://www.gabriel.money>, and other sites we own and operate.

This Privacy Policy describes the types of personal information we collect, how we use the information, with whom we may share it, and the choices available to you. We also describe measures we take to protect the security of the information and how you can contact us about our privacy practices.

This privacy policy is provided by Gabriel Money, Inc. and applies to Gabriel Money products and services. This policy is effective as of 01 January 2023 and was last updated on 03 October 2023.

## **Information We Collect**

The personal information we collect depends on how you interact with us, the services you use, and the choices you make.

We collect information about you from different sources and in various ways when you use our services, including information you provide directly, information collected

automatically, information from third-party data sources, and data we infer or generate from other data.

## **Log Data**

When you visit our website, our servers may automatically log the standard data provided by your web browser. It may include your device's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, other details about your visit, and technical details that occur in conjunction with any errors you may encounter.

Please be aware that while this information may not be personally identifying by itself, it may be possible to combine it with other data to personally identify individual persons.

## **Personal Information**

We may ask for personal information which may include one or more of the following:

- Identifiers such as name, Social Security number, ITIN number, date of birth, postal and email address, and phone number;
- Government-issued photo ID, such as a driver's license or passport, photograph, proof of address documentation (such as a utility bill) and proof of identity documentation (such as a marriage document);
- Login credentials for your Gabriel Money account;
- Financial information;
- Information included on a tax return you provide;  
Credit score and other credit history data from a credit reporting agency, if you enroll in certain features of the Services;
- Employment information, including occupation, information about your employer, employee email address, and income details (such as source of income, approximate or expected income and how frequently you are paid);
- Physical characteristics, demographic information and similar details (such as sex, gender, race, color, marital or family status, citizenship status, military or veteran status, signature, language preference and national origin) present in documents (e.g., IDs, tax returns) you provide;

- Commercial information, including interest in a product or service, purchasing or consuming tendencies, and receipts or records of purchase or enrollment in products or services;  
Voice recordings (such as when you call Gabriel Money’s member services);
- Biometric information (such as a facial image collected for identity verification, if you use certain features of our App);
- Social media handles;  
Information you provide through member services interactions and that you provide about your experience with Gabriel Money, including via questionnaires, surveys, participation in user research or other feedback;
- Geolocation data;
- Information provided by identity verification and fraud prevention platforms;
- Information provided by marketers and other websites on which Gabriel Money advertises;
- Information you provide through contacts integration, including a list of contacts from your phone’s operating system; and
- Other information you choose to provide, such as through our “Contact Us” feature, emails or other communications (such as with member services), referrals, chatbots, surveys, research participation, on social media pages, or in registrations and sign-up forms.
- We may infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics (“inferences”). For example, we may infer your general geographic location (such as city, state, and country) based on your IP address.

### **Legitimate Reasons for Processing Your Personal Information**

We may collect personal information from you when you do any of the following on our website:

- Sign up to receive updates from us via email or social media channels
- Use a mobile device or web browser to access our content
- Contact us via email, social media, or on any similar technologies
- When you mention us on social media.

We may collect, hold, use, and disclose information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

- to enable you to customize or personalize your experience of our website provide the services
- process and fulfill transactions
- establish and manage Gabriel Money accounts
- to contact and communicate with you
- provide you targeted offers and notify you of third-party locations where you may use our products and services
- facilitate payroll or other direct deposits (including tax refunds) to your Gabriel Money account
- facilitate transfers between external bank accounts and Gabriel Money accounts
- verify your identity, including to facilitate a name change request
- operate, evaluate and improve our business
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities
- exercise our rights and remedies and defend against legal claims
- comply with and enforce applicable legal requirements, relevant industry standards and Gabriel Money policies
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you
- to enable you to access and use our website, associated applications, and associated social media platforms
- for internal record keeping and administrative purposes
- for security and fraud prevention, and to ensure that our sites and apps are safe, secure, and used in line with our terms of use

Please be aware that we may combine information we collect about you with general information or research data we receive from other trusted sources.

On our Services, we may obtain information about your online activities to provide you with advertising about products and services that may be tailored to your interests.

You may see our ads on other websites because we use third-party ad services.

### **Information we may share**

We may share the information we obtain about you with our affiliates and subsidiaries; our Bank Partners; other Gabriel Money users; other companies in connection with co-branded products, services or programs; joint marketing partners; research study partners; and consumer reporting agencies. We also may share the information we obtain about you with vendors and other entities we engage to perform services on our behalf, such as payment and check deposit processors, risk detection and mitigation tools, and modeling and analytics tools.

We also may disclose personal information (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent.

We reserve the right to transfer any personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

### **Security of Your Personal Information**

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification.

Although we will do our best to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. We will comply with laws applicable to us in respect of any data breach.

You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

### **How Long We Keep Your Personal Information**

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you.

However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

### **Children's Privacy**

We do not aim any of our products or services directly at children under the age of 13, and so, we do not knowingly collect personal information about children under 13.

### **Disclosure of Personal Information to Third Parties**

Our Services may provide links to other online services, and may include third-party features such as apps, tools, widgets and plug-ins. These online services and third-party features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, are subject to the privacy disclosures of these parties, which we strongly suggest you review. To the extent any linked online services or third-party features are not owned or controlled by Gabriel Money, we are not responsible for these third parties' information practices.

We may disclose personal information to:

- a parent, subsidiary, or affiliate of our company
- third party service providers for the purpose of enabling them to provide their services, for example, IT service providers, data storage, hosting and server providers, advertisers, or analytics platforms
- our employees, contractors, and/or related entities
- our existing or potential agents or business partners

- sponsors or promoters of any competition, sweepstakes, or promotion we run courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights
- third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you third parties to collect and process data

### **International Transfers of Personal Information**

The personal information we collect is stored and/or processed where we or our partners, affiliates, and third-party providers maintain facilities. Please be aware that the locations to which we store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this privacy policy.

### **Your Rights and Controlling Your Personal Information**

You always retain the right to withhold personal information from us, with the understanding that your experience of our website may be affected. We will not discriminate against you for exercising any of your rights over your personal information. If you do provide us with personal information, you understand that we will collect, hold, use and disclose it in accordance with this privacy policy. You retain the right to request details of any personal information we hold about you.

If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time. We will provide you with the ability to unsubscribe from our email-database or opt out of communications. Please be aware we may need to request specific information from you to help us confirm your identity.

If you believe that any information, we hold about you is inaccurate, out of date,

incomplete, irrelevant, or misleading, please contact us using the details provided in this privacy policy. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

### **Special Notice for State Residents**

Residents of Vermont: We will not share with nonaffiliates except for our own marketing purposes, our everyday business purposes, or with your consent.

Residents of Nevada: We are providing this notice pursuant to Nevada law.

Residents of California: Pursuant to your rights under the California Consumer Privacy Act (CCPA), We will not share your information with companies outside of Gabriel Money, except for our everyday business purposes, for marketing our products and services to you, or with your consent.

### **For California Consumers**

We may collect (and may have collected during the 12-month period prior to the effective date of this Statement) your personal information as described above on Gabriel Money's Privacy Policy.

We may use (and may have used during the 12-month period prior to the effective date of this Statement) your personal information for the purposes described in our Gabriel Money Privacy Policy and for the following business purposes specified in the CCPA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services;



- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

During the 12-month period prior to the effective date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you sign up for an account or contact member services, or participate in, sweepstakes, promotions, or research or survey activities
- Our Bank Partners
- Your devices, when you use our Site or App
- Your family or friends, such as when they provide us with your contact information by choosing to share their phone contacts with Gabriel Money
- Payment processors
- External banks (i.e., banks other than our Bank Partners) if you link a non-Gabriel Money bank account
- Credit reporting agencies
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf

- Our joint marketing partners
- Our business partners (such as referring websites)
- Online advertising services and advertising networks
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers

During the 12-month period prior to the effective date of this Statement, we may have shared your personal information with certain categories of third parties, as described below.

<b>Category of Personal Information</b>	<b>Category of Third Party</b>
Identifiers	Our Bank Partners, other Gabriel Money users, our marketing partners, and your employer
Additional Data Subject to Cal. Civ. Code § 1798.80 Law	Our Bank Partners, our marketing partners, and your employer
Protected Classifications	Our Bank Partners
Commercial Information	Our Bank Partners and our marketing partners
Biometric Information	Our Bank Partners and identity verification partners
Online Activity	Our Bank Partners and our marketing partners

<b>Category of Personal Information</b>	<b>Category of Third Party</b>
Geolocation data	Our Bank Partners
Sensory Information	Our Bank Partners
Employment Information	Our Bank Partners

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Statement, we may have shared personal information about you with the following additional categories of third parties: government entities; other persons to whom we have a legal obligation to disclose personal information; and other persons to whom you authorize Gabriel Money to disclose your personal information.

Below are rights that are specific to California Residents:

- Right to Opt-Out / “Do Not Sell or Share My Personal Information”.
- Access. You have a right to request that we disclose to you, twice in a 12-month period, the personal information we have collected about you. You also have a right to request additional information about our collection, use, disclosure, or sale of such personal information, which is also provided in this privacy statement.
- Right to Request Correction or Deletion. You also have rights to request that we correct inaccurate personal information and that we delete personal information under certain circumstances, subject to a number of exceptions.
- Right to opt-out of targeted advertising (Virginia residents).
- Shine the Light Request. You also may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties.

## **Use of Cookies**

We use “cookies” to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified.

### **Limits of Our Policy**

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

### **Changes to This Policy**

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

### **Contact Us**

For any questions or concerns regarding your privacy, you may contact us through our Social Media or e-mail us through [support@gabriel.money](mailto:support@gabriel.money). You can also call us at 1-888-601-4224 or mail us at 1190 North Highland Ave NE # 8629, Atlanta, GA, 30306.