

DATA USE POLICY

Last revised: January, 2022

WELCOME!

We are providing this Data Use Policy to help you understand how we collect, use, share, and process your Personal Information (defined below) and to tell you about your rights and choices regarding how we process your Personal Information. Please read this Policy carefully.

When you use our Services you acknowledge that you have accepted the practices we describe in this Policy. If you do not agree with these practices, please do not use or access the Services.

CHANGES TO OUR POLICY

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Services following notice of any changes indicates acceptance of any changes.

WHO WE ARE

This is the Data Use Policy (“**Policy**”) of Aven Financial, Inc., a Delaware corporation, and its affiliates and subsidiaries, including Aven Financial Technologies, Inc., a Delaware corporation, Aven Crypto, Inc., a Delaware corporation, and Aven Auto, Inc., a Delaware corporation (collectively, “**Company**”, “**us**”, “**our**”, or “**we**”). Our principal office is located at 330 Primrose Road Suite 412, Burlingame, CA 94010. Aven is a service mark and registered dba of Aven Financial, Inc.

You can contact us using the information below.

WHAT DOES THIS POLICY COVER?

This Policy applies to our “**Services**,” which include aven.com, crypto.aven.com, advisor.aven.com, and any other websites where we link to or post this Policy, including any subdomains or mobile versions (the “**Site**” or “**Sites**”), any Aven mobile applications, as well as any online services available through our Sites, except as otherwise specified below.

This Policy does not apply to nonpublic personal information we process in connection with our financial products and services listed below. All nonpublic personal information processed in connection with our financial products or services is governed by our Consumer Privacy Notice and the Consumer Privacy Notice of our bank partner, Coastal Community Bank, which are also available on our Sites, including without limitation:

- Credit card/loan applications (including prequalification verifications)
- Credit card/loan account information or statements
- Credit card/loan transaction/payment information
- Device/Network data collected in connection with our financial products or services (e.g. anti-fraud or security related information).

This Policy does not apply to information processed by third parties, for example, when you visit a third-party website or interact with third-party services, unless we process information from those parties. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

HOW WE COLLECT AND USE PERSONAL INFORMATION

Personal Information We Collect

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“**Personal Information**”). We collect and process the following categories of Personal Information (note, specific Personal Information elements are examples and may change):

<i>Identity Information</i>	Personal Information about you and your identity, such as your name, username, biographic/profile information, employment, and other Personal Information you voluntarily provide us on registration forms or as part of an account profile.
<i>Contact Information:</i>	Identity Information used to contact you, such as your email address, physical address, or phone number.
<i>Property Information:</i>	Identity Information identifying property you own, such as an address for real estate, or license plate/VIN number.
<i>Device/Network Information:</i>	Personal Information relating to your device, browser, or application, for example, IP addresses, MAC addresses, application ID/AdID/IDFA, identifiers from cookies, session history and similar browsing metadata, and other data generated through applications and browsers, including via cookies and similar technologies.
<i>User Content:</i>	Personal Information included in content provided by users of the Service in any free-form or unstructured format, such as in a “contact us” box, free text field, in a file or document, or messages to us.
<i>Inference Information:</i>	Personal Information inferred about personal characteristics and preferences, such as predicted creditworthiness, demographics, interests, behavioral patterns, psychological trends, predispositions, or behavior.
<i>Location Information:</i>	Information about your precise location, for example, location coordinates obtained from GPS, wi-fi, and similar locations services used by your device.

Sources of Personal Information

We collect Personal Information from various sources based on the context in which we process it:

<i>You:</i>	We collect Personal Information from you directly, for example, when you input information into an online form, sign up for a waiting list, or contact us directly.
<i>Your Devices:</i>	We may collect certain Personal Information automatically from your devices. For example, we collect Device/Network Information automatically using cookies and similar technologies when you use our Service, access our Sites, or when you open our marketing communications.
<i>Service Providers:</i>	We receive Personal Information from third parties with whom we have a relationship in connection with a relevant transaction, or who collect information on our behalf.
<i>Data Aggregators:</i>	We collect Personal Information from data aggregators that maintain databases of information relating to individuals and who provide us with certain data we use to augment an individual’s profile or other Personal Information we maintain.
<i>Advertising Networks:</i>	We may collect certain information, such as Device/Network Information or Inference Information from advertising networks that operate on our Sites.
<i>Creation/Inference:</i>	We (or third parties operating on our behalf) create and infer Personal Information (such as Inference Information) based on our observations or analysis of other Personal Information we process, and we may correlate this information with other information we process about you.

How We Process Personal Information

Communications

We may process Identity Information, Device/Network Information, Inference Information and Contact Information in connection with email and SMS marketing communications (such as promotional emails), which you might receive if you sign up for updates regarding our products and services, choose to receive SMS/email marketing communications, or engage in a transaction allowing us to send you email marketing communications. We may also collect Device/Network Information when you open or interact with email marketing communications. We may send you SMS communications by automated means.

Subject to your rights and choices, we use Identity Information, Inference Information, and Contact Information as necessary to customize, deliver, and otherwise process marketing communications, and in order to tailor certain communications to individuals' preferences and requests. Additionally, we may process Device/Network Information from devices receiving those marketing communications as part of our business interests in understanding whether our emails are opened or other aspects of engagement with such marketing communications.

Account Registration & Profiles

We generally collect and process Identity Information, Device/Network Information, and Contact Information when you register and create an account or complete a profile on our Service. We may also collect Property Information or User Content on certain profile forms. We generally use this as necessary to create, maintain, and provide your account and the service or features you request, or as necessary to contact you with important information about your account or our Service.

We may also use profile information for certain commercial purposes (described below), such as to determine the value of property and determine various offers or promotions that may interest you, or your estimated creditworthiness. Information submitted in your profile is used to provide estimates and general information to you.

Note: Loan and credit qualifications and terms are based on information submitted in applications for our financial products and services, and subject to our Consumer Privacy Notice.

When you access or use our online Services

When you use our Services, we automatically collect and process Device/Network Information (including using cookies and similar technologies). We may also collect and process Contact Information, Identity Information, and Inference Information that we collect, create, and/or receive. We use this information as necessary to initiate or fulfill your requests for certain features, or enable the functionality of our Services, such as keeping you logged in, delivering pages, etc.

Some of our Services may, with your consent, process Location Information. We use this information, together with Inference Information, and Device/Network Information in order to verify your location, customize content available through the Services based on your location, and other features that require the use of location. We may also use this information for business purposes, such as, creating aggregate information about users' location and patterns, in connection with security/anti-fraud purposes, or to help improve our Services. We may also use Identity Information, Device/Network Information, Location Information, Inference Information and Contact Information collected in this context for Commercial Purposes.

Contact Us

When you contact us through the Site via a contact box or our chat, we process on your behalf certain Personal Information such as Identity Information, Device/Network, and any Personal Information contained within any User Content. We use Identity and Contact Information and User Content as necessary to communicate with you about the subject matter of your request and related matters. We may also use information collected when you contact us in connection with marketing communications, if relevant to your request. We may use a third-party service provider to operate our chat.

Cookies and Similar Tracking Technologies

We, and certain third parties, may process Identity Information, Contact Information, and Device/Network Information when you interact with cookies and similar technologies on our Services. We may receive this

information from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Information collected through them.

Subject to your rights and choices, we may use this information as follows:

- for “essential” or “functional” purposes, such as to enable certain features of the Services, or keeping you logged in during your session;
- for “analytics” and “personalization” purposes, consistent with our business interest in how the Services are used or perform, how users engage with and navigate through our Service, what sites users visit before visiting the Service, how often they visit the Service, and other similar information, as well as to greet users by name and modify the appearance of the Service to usage history, tailor the Service based on geographic location or Customer, and understand characteristics of users in various technical and geographic contexts; and
- for retargeting or Online Advertising (described below), such as:
 - for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter;
 - to collect information about your preferences and demographics to help target advertisements which are more likely to be of interest to you using behavioral advertising; and
 - to allow us to carry out retargeting (this includes, for example, when advertisements are presented to you for products or services which you have previously looked at on a website but have not purchased).

Note: Some of these technologies can be used to identify you across Services, devices, sites, and other services.

Business Purposes of Processing

In addition to the processing described above, we generally process Personal Information for several common purposes in connection with our business.

Service Provision and Contractual Obligations

We process any Personal Information as is necessary to provide the Services, and as otherwise necessary to fulfill our obligations to you, for example, to provide you with the information, features, and services you request. We may also use Personal Information to fulfill any contracts we have with you.

Internal Processes and Service Improvement

We may use any Personal Information we process through our Services as necessary to improve the design of our Services, understand how our Services are used or function, for customer service purposes, to create and analyze logs and metadata relating to Service use, and to ensure the security and stability of the Services. Additionally, we may use Personal Information to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our Users. This processing is subject to users' rights and choices.

Aggregate Analytics

We process Personal Information as necessary in connection with our creation of aggregate analytics relating to how our Services are used, the products and services our users purchase, to create service delivery metrics, and to create other reports regarding the use of our Services, demographics of our Users, and other similar information and metrics. The resulting aggregate information will not contain information from which an individual may be readily identified.

Security and Fraud Detection

Whether online or off, we work to ensure that our Services are secure, and we work to prevent fraud on our Services. We may process any Personal Information we collect in connection with our legitimate business interest in ensuring that our properties and locations are secure, to identify and prevent crime, prevent fraud, and ensure the safety of our users. Similarly, we process Personal Data on our Services as necessary to detect security

incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Information in connection with our information security activities.

Compliance, Health, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Information subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfill our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the information sharing section for more information about how we disclose Personal Information in extraordinary circumstances.

Sale of Personal Information

For purposes of the California Consumer Privacy Act (Cal. Civil Code § 1798.101 et seq), we do not “sell” your Personal Information.

Other Processing of Personal Data

If we process Personal Information in connection with our Services in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to Users' rights and choices) unless otherwise stated when you provide it.

Commercial Purposes of Processing

Personalization & Consumer Profiles

In order to understand our customers' preferences, and better recommend products and services to users, we may create a consumer profile by linking together and analyzing Personal Information we collect through our Services. We may also augment Consumer Profiles with Personal Information that we create (such as Inference Information) or that we receive from certain third parties.

We use Consumer Profiles to conduct market research and statistical analysis in connection with the improvement of our Services, as well as in connection with the analysis of customer property, potential collateral, and to tailor what services we may suggest to you. For example, we may analyze the value of certain property, estimate available loan terms, or suggest offers, products, or services that may be of interest to you. We may also use consumer profiles in connection with our marketing communications, or Online Advertising (as described below).

Note: Loan and credit qualifications and terms are based on information submitted in applications for our financial products and services, and subject to our Consumer Privacy Notice, which is also available on this website.

Online Advertising

We, and certain service providers operating on our behalf, may engage in online advertising that involves the processing of Personal Information we collect under this Data Use Policy. Online advertising involves various parties engaged in the processing of Personal Information in connection with the delivery, analysis, and other processing related to our online advertising activities. For example, these third parties may, on our behalf, augment your profile with demographic and other Inference Information, and may also track whether you view, interact with, or how often you have seen an ad, or whether you complete a transaction for a good or services you were shown in an advertisement. We generally use online advertising for the purpose of marketing our Services and goods and services of our affiliates and related parties, as part of our marketing communications, or in connection with the development of marketing profiles or audiences.

HOW WE SHARE INFORMATION

We may share information we collect with a variety of parties, depending upon the purpose for and context in which we obtained the information. We generally transfer information to certain categories of recipients or in connection with specific business purposes, each described below.

Partners/Services

We may operate our Services in connection with third party banks or lenders. Where we partner with a bank or third-party lender as part of the services you receive, we may share Personal Information collected as part of your account registration and profile with that partner/lender.

Service Providers

In connection with our general business operations, product or service improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Information with service providers or sub-processors who provide certain services or process information on our behalf. For example, we may use cloud-based hosting providers to host our Services or disclose information as part of our own internal operations, such as security operations, internal research, etc.).

Data Aggregators

In connection with our product and personalization services, we may share certain Personal Information contained in a user profile with third party service providers who provide us with data to augment or provide additional data or context to user profiles. For example, we may request data from data aggregators to determine the value of certain property and to obtain additional information regarding the credit products most likely to appeal to an individual.

Corporate Events

Your Personal Information may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Information may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Affiliates

In order to streamline certain business operations, marketing activities, services, offers, and other content we believe would be of interest to you, and develop products and services that better meet the interests and needs of our customers, we may share your Personal Information with any of our current or future affiliated entities, subsidiaries, and parent companies.

Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Information, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use or a customer agreement, or in the vital interests of us or any person. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Information to such parties.

YOUR RIGHTS AND CHOICES

Your Rights

Applicable law may grant you rights in your Personal Information. These rights vary based on your location, state or country of residence, and may be limited by or subject to our or our Customers' own rights in your Personal Information. In cases where we process Personal Information on our own behalf, you may exercise rights you have by contacting us at support@aven.com.

All rights requests we receive directly must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Information. We may require that you log in to your account or verify that you have access to your account or the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

For information regarding your California Privacy Rights, please see below.

Your Choices

You may have the following choices regarding the Personal Information we process, to the extent required under applicable law:

Consent: If you consent to processing, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services.

Direct Marketing: You have the choice to opt-out of or withdraw your consent to marketing communications. You may have a legal right not to receive such messages in certain circumstances, in which case, you will only receive direct marketing communications if you consent. You may exercise your choice via the links in our communications, by replying STOP to any SMS message, or by contacting us re: direct marketing.

Location Information: You may control or limit Location Information that we collect using our online Services by changing your preferences in your device's location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services.

Cookies & Similar Tech: If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser's settings menu. You must opt out of the use of some third party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit Google Ads Privacy Policy, or Google Analytics Opt-out.

Behavioral advertising: You may opt out or withdraw your consent to behavioral advertising. You must opt out of third party services directly via the third party. For example, to opt out of Google's use of cookies, visit Google's Ads Settings, here. To opt out from Facebook Custom Audience Pixel, visit their customer support page here. To learn more about how to opt out of Twitter's use of audience pixels, visit the Twitter help page here. If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonpii.asp.

Other Processing: You may have additional choices under applicable law. Contact us re: data rights requests if you believe you have such rights.

SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Information you provide us. However, we sometimes share Personal Information with third parties as noted above, and though we may enter contracts to help ensure security, we do control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Information or any other information you provide us will remain secure.

DATA RETENTION

We retain information for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. We will review retention periods periodically, and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate.

MINORS

Our Services are neither directed at nor intended for use by minors under the age of majority in the relevant jurisdiction. Further, we do not knowingly collect Personal Information from such individuals. If we learn that we have inadvertently done so, we will promptly delete it.

INTERNATIONAL TRANSFERS

We operate in and use service providers located in the United States, and our Service is intended solely for the US market. If you are located outside the U.S., your Personal Information may be transferred to the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Information in foreign countries. Contact us for more information regarding transfers of data to the U.S.

YOUR CALIFORNIA PRIVACY RIGHTS

Under the California Consumer Privacy Act (“CCPA”) and other California laws, California residents may have the following rights, subject to your submission of an appropriately verified request (see below for verification requirements):

Privacy Rights

Right to Know

You may have the right to request any of following, for the 12 month period preceding your request: (1) the categories of Personal Information we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Information was collected; (3) the business or commercial purpose for which we collected or sold your Personal Information; (4) the categories of third parties to whom we have sold your Personal Information, or disclosed it for a business purpose; and (5) the specific pieces of Personal Information we have collected about you.

Right to Delete

You may have the right to delete certain Personal Information that we hold about you, subject to exceptions under applicable law.

Right to Non-Discrimination

You may have the right to not to receive discriminatory treatment as a result of your exercise of any rights conferred by the CCPA.

Direct Marketing

You may request a list of Personal Information we have disclosed about you to third parties for direct marketing purposes (if any) during the preceding calendar year.

Opt-Out of Sale

If we engage in sales of Personal Information (as defined by applicable law), you may direct us to stop selling or disclosing Personal Information to third parties for commercial purposes. At this time, we do not sell Personal Information.

Submission of Rights Requests

You may submit requests, as follows (see below for summary of required verification information):

Right to Know

You may email us at support@aven.com. Please provide your email address, phone number and address we have on file for you along with your desire to know what Personal Information we have on you.

Right to Delete

You may email us at support@aven.com. Please provide your email address, phone number and address we have on file for you along with your desire to have your data deleted.

Direct Marketing

You may request a list of any relevant direct marketing disclosures (if we have made any) via email to our privacy team at support@aven.com.

Verification of Rights Requests

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Information. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as an address, phone number, or other information we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

Supplemental Information Processing Disclosures

Categories of Personal Information Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for "business purposes" the following categories of Personal Information: Identity Information, Contact Information, Transaction Information, Device/Network Information, Biographical Information, and User Content.

Information Sale

For purposes of the CCPA, we do not "sell" your Personal Information.

Right to Know

Category of Information	Category of Sources	Business and Commercial Purposes	Category of Recipients
Identity Information	You; Your Devices; Service Providers; Data Aggregators; Advertising Networks; Data we create or infer	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles; Online Advertising	Partners; Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures
Contact Information	You; Your Devices; Service Providers; Advertising Networks	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles; Online Advertising	Partners; Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures
Location Information	Your Devices; Service Providers	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles; Online Advertising	Partners; Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures

Property Information	You; Service Providers; Data Aggregators	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles	Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures
Device/ Network Information	You; Your Devices; Service Providers; Advertising Networks	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles; Online Advertising	Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures
Inference Information	Service Providers; Data Aggregators; Advertising Networks; Information we create or infer	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles; Online Advertising	Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures
User Content	You	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Security and Fraud Detection; Compliance, Health, Safety & Public Interest; Other Processing; Personalization & Profiles	Service Providers; Data Aggregators; Affiliates; Corporate Events; Legal Disclosures

CONTACT Us

Feel free to contact us with questions or concerns using the appropriate address below.

General inquiries: support@aven.com

Information rights requests: support@aven.com

Physical address: 330 Primrose Road, Suite 412 Burlingame, CA 94010

Toll-Free Phone: 888-966-4655