

Privacy Policy

Effective date: December 2015

We at Nickel Labs, Inc. ("Nickel," "we" and "us") know you care about how your information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways. Remember that your use of Nickel's Services is at all times subject to the [Terms of Use](#), which incorporates this Privacy Policy. The "Services" covered by this Privacy Policy includes our website(s), applications, services and products, including the Nickel Card – a prepaid reloadable card offered in conjunction with an issuing bank.

WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy covers our treatment of information that we gather when you are accessing or using our website(s), mobile app(s), products or services (the "Services."). We gather various types of information from our users, as explained in more detail below. We also include information about how we handle information we gather from children under 13 years old in the section below titled "[What about Children's Privacy?](#)" This privacy policy does not apply to the information collection practices of third parties we do not own, control, or manage.

WILL NICKEL EVER CHANGE THIS PRIVACY POLICY?

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on the nickel.co website, by sending you an electronic notification, and/or by some other means. We will include the date the policy was last updated. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. You should review this Privacy Policy periodically. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

WHAT INFORMATION DOES NICKEL COLLECT?

Information You Provide to Us

We receive and store any information you knowingly provide to us. For example, if you are a Parent or Guardian and establish an account with us, **we may collect personally identifying information from you such as your name, email address, phone number, physical address, date of birth, payment information, full or partial Social Security number, driver's license number and the names and date of birth of your children.** We collect information such as full or partial Social Security number and driver's license number so that we may authenticate you as a user of our Services and fulfill legal requirements to confirm customer identity prior to the issuance of a payment card or other financial account. We collect information from you as a parent or guardian about you and your children who will be using the Services. We collect this information to create your children's profile and to obtain your consent to collect further information from them through our Services if they are under 13 years old. Some of the

information we collect may be required to register with us or to take advantage of some of our features. If you are a child, we collect certain information from you so you can use the Services. If you are a parent or child, please see the section below titled [“What about Children’s Privacy?”](#) for further information about the information we collect from children under 13 years old, and how we use and share it.

Information Collected Automatically

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, **which may include your IP address**, unique device identifier, “cookie” information, the type of browser and/or device you’re using to access our Services, device operating system, and the page or feature you requested. “Cookies” and similar technologies act as identifiers and we transfer them to your browser or device to allow us to recognize your browser or device and to provide us information such as how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

We, our service providers and partners, including advertising partners, and other third-party services, may also transmit cookies to your browser or device or use other similar technologies, when you visit our Services or click on their links that appear on the Services. Through cookies or similar technologies placed on your browser or device, we may collect information about your online activity during and after you leave our Services. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

Transaction Information

Our Services include various forms of payment cards or other financial products we make available to consumers. We offer these cards and other services through arrangements with issuing bank(s), credit card network(s) and payment card platform companies (collectively, our “Partners”). As part of the Nickel Services, you may also have a direct relationship with one of our Partners, for example, the card issuing bank. These Partners provide us with information about the transactions made from your account, including those made by additional users you authorize.

Do Not Track Policy

Just like any other usage information we collect, the information we collect automatically described above allows us to improve the Services and customize your online experience. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

Google Analytics

We use Google Analytics to help analyze how our users' use the Service. Google Analytics uses cookies to collect information such as how often our users visit the Service, what pages they visit, and what other sites they used prior to coming to the Service. We may use the information we get from Google Analytics to improve our Service or to send you promotional messages about our Services. Google Analytics collects the IP address assigned to you on the date you visit the Service, but not your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with any personally identifying information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Service, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Service is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You may find additional information about Google Analytics at www.google.com/policies/privacy/partners/. Finally, you can opt out of Google Analytics by using the following add-on:<https://tools.google.com/dlpage/gaoptout/>.

How Do We Use the Information We Collect?

We use the information we collect internally in connection with our Services, including to allow you to set up a user account and profile, provide you and other users you authorize with Services, personalize services, improve our services, fulfill your requests for certain products and services, and to analyze how you use the Services.

We also may provide you with marketing offers for our or other businesses' products and services. We may communicate with you through the Service based on information collected automatically, including to facilitate advertising better tailored to you and your interests, or we may, with the assistance of third parties, use that information for advertising delivered to you on third party sites or services. We may also communicate with you through other contact information you provide us, such as email and phone number. When you provide a mobile device phone number to us, we may communicate with you via text message (i.e., SMS) or phone call to that number, including through an autodialer or prerecorded message. We also may provide features that facilitate your communications with others within the Services. While we may facilitate the functionality, the communications to others that you initiate are from you, not us.

We may receive a confirmation when you open an email or other communication from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive marketing communications from us, please indicate your preference by disabling mobile notifications in your mobile phone's operating system, by replying to one of our SMS messages with the word "unsubscribe," and for emails by using the opt-out mechanism provided in the email. In certain cases, we may also share your information with third parties as described below.

WILL NICKEL SHARE ANY OF THE INFORMATION IT RECEIVES ABOUT ME?

We may share your Information with third parties as described in this section:

Information that's no longer personally identifiable: We may use reasonable methods to anonymize your personally identifying information so that you are not individually identified by name, phone number, address or other similar data point that identifies you, and provide that information to third parties. We may also provide de-identified aggregate usage information to third parties who may use such information to understand how often and in what ways people use our Services.

Advertisers: We may place tailored ads on social media websites and services, which may entail our sharing of certain information about your account with the social media service. We also may allow advertisers and/or merchant partners ("Advertisers") to choose the demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for San Francisco businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in a manner that would not identify you personally. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

Affiliates: We may share your information with any Nickel's affiliates, such as any parent compan(ies), sister companies or other companies under common control or ownership.

Business Partners and other Third Parties: We may share your information with businesses or third party websites we have entered into contracts with or otherwise partner with to sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can generally recognize when an affiliated business is associated with such a transaction or service based on branding and similar information, or where you have entered into a direct relationship with a Partner to use our Services. For example, to provide you a payment card under the Services, you may have to enter into a direct customer relationship with a card issuing bank Partner. We will share your information with that Partner to facilitate our offering of the Services. We have no control over the policies and practices of third party websites or businesses including Partners as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, including a Partner, please review all such business' or websites' policies.

Agents/Service Providers: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. For example, we may use a payment processing company to receive and process your subscription payments and money transfers, or we may use an identity verification service to confirm your personal identity. Unless we tell you differently, we do not grant our service providers the right to use the personally identifying information we share with them beyond what is necessary to assist us.

User Profiles and Submissions: Certain user profile information, including your name, location, and any video or image content that such user has uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others. Please remember that any content you upload to your public user profile, along with any Personal Information or content that you

voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone. Your user name may also be displayed to other users if and when you send messages or comments or upload images or videos through the Services and other users can contact you through messages and comments.

Business Transfers: We may choose to buy or sell assets or ownership interests in the company, and may share and/or transfer your information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, your information could be one of the assets transferred to or acquired by a third party.

Protection of Nickel and Others: We reserve the right to access, read, preserve, and disclose any information pursuant to government requests or when we reasonably believe it is necessary to comply with law including, for example, when we receive a subpoena or court order; to enforce or apply our [Terms of Use](#) and other agreements; or to protect the rights, property, or safety of Nickel, our employees, our users, or others.

Sweepstakes, Contests and Promotions: We may offer sweepstakes, contests, and other promotions (each, a “Promotion”) through the Services that may require registration. By participating in a Promotion, you are agreeing to official rules that govern that Promotion, which may contain specific requirements such as allowing the sponsor of the Promotion to use your name, voice, or likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Promotion’s official rules

IS PERSONAL INFORMATION ABOUT ME SECURE?

Your account is protected by a passcode for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your passcode appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

WHAT PERSONAL INFORMATION CAN I ACCESS?

Through your account settings, you may access, and, in some cases, edit or delete the personally identifying information, such as phone number and address, that you’ve provided to us:

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at help@nickel.co.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: help@nickel.co.

WHAT CHOICES DO I HAVE?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features or to participate in our Services.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by contacting us at help@nickel.co. Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your personally identifying information after you update or delete it, but not in a manner that would identify you personally.

WHAT ABOUT CHILDREN'S PRIVACY?

When you sign up a family member that is under 13 years old, the Children's Online Privacy Protection Act (COPPA) applies when your child activates and uses the Nickel Card. This section of the privacy policy applies to how we use and disclose the information about children under 13.

During the sign-up process, parents consent to our collection of information from children under 13. We collect your child's phone number, date of birth, and Nickel Card information for activation during your child's download of the app. We will collect transaction and other information associated with your child's use of the app and the Nickel Card, including spend, savings, and where transactions occur. We may provide mechanisms for children to communicate with others, for example, through app functionality that facilitates text messaging or email messages to other individuals selected by you or your child.

We also automatically receive and record information on our server logs from your child's browser or device, which may include your child's IP address, unique device identifier, "cookie" information, the type of browser and/or device used to access our Services, device operating system, and the page or feature requested. "Cookies" and similar technologies act as identifiers and we transfer them to your browser or device to allow us to recognize your child's browser or device and tell us how and when pages and features in our Services are visited. This information is collected to provide support for our internal operations.

We may disclose your child's information to our affiliates, agents (i.e., service providers), pursuant to governmental or other legal requests, to protect our rights or those of others, for business transactions such as the sale of our assets or business, and for non-personally identifiable information like device identifiers and IP addresses, to online advertising companies and others.

Nickel Labs is the operator of the Services. Our address, telephone number and email address is P.O. Box 59, Palo Alto, CA 94302; 1-855-622-5830; help@nickel.co. Other non-service provider entities that receive information from your child as a function of using the app are Sutton Bank, the issuer of the Nickel Card, and MasterCard, the Nickel Card payment network.

Parents can review their children's transaction information through account privileges associated with the application. Parents can also review information like the child's name, birthdate and phone number that are part of the child's account. If you no longer want Nickel to collect information from your child or want your child's information deleted, please contact us at help@nickel.co.

WHAT IF I HAVE QUESTIONS ABOUT THIS POLICY?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to help@nickel.co, and we will try to resolve your concerns.