

PRIVACY POLICY

Leap Privacy Policy

Leap values your trust and protecting your information is our highest priority. Leap is committed to your privacy. This Privacy Policy explains what information we collect, how information is collected, how we use that information, what information is shared with whom, and how Leap protects your information when you use our products and services ("Services"). Please visit our [Terms](#) page for additional terms and conditions applicable to the Services.

Information we collect

Leap collects the following information about you:

Personal Information. This is information that directly or indirectly identifies you, such as your name, email address, or other identifying information about you.

Protected Financial Information ("PFI"). PFI is your Personal Financial Information. State and federal laws closely regulate how Leap may handle, protect, and share your PFI. Leap may offer certain Services to you based on your relationship with employers, banking and financial institutions, loan providers, insurance companies, or other entities (each an "Enterprise Organization") with an interest in your credit rating, debt ratio, financial stability and/or eligibility or qualifications for certain program ("Enterprise Programs"). Leap must comply with state and federal laws when you receive Services from Leap as part of an Enterprise Program.

Other Information. Other Information is information that, by itself does not individually identify you, such as browser type, operating system, technical data, and usage. We may link together different types of Other Information or link Other Information to Personal Information.

How We Collect Information

We collect information in the following ways:

- **Information Upon Registration.** For example, many of our Services require you to sign up for a Leap Account. When you do, we'll ask for personal information, like your name, email address, telephone number or credit card. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible Leap Profile, which may include your name and photo.
- **Information from Your Employer or Financial Institution.** When you are eligible to participate in an Enterprise Program, an Enterprise Organization may provide us with PFI such as your name, date of birth, gender, marital status, licenses, tax

filings, social security number, credit score, credit history, bankruptcy filings, mailing address, employment history and details, among other things. We use this information to provide services to you on behalf of lending and banking institutions, in our capacity as a business associate of an Enterprise Program or Enterprise Organization.

- Information from Other Sources. We may obtain information about you from affiliates, partners, and other third parties. This information may be used to provide services to you and to provide analysis about you in comparison to people who are demographically similar to you. We may combine the information we obtain from third parties with information that we have collected about you.
- Information We Get from Your Use of Services. We may collect information about the Services that you use and how you use them. This information includes:
 - Computer, Tablet, or Mobile Telephone information. We may collect device-specific information such as your hardware model, operating system version, unique device identifiers, device sensors and mobile network information including phone number. Leap may associate your device identifiers or phone number with your Leap Account. We will comply with the usage/license restrictions and requirements applicable to the device from which the information comes.
 - Log Information. When you use our Services or view content provided by Leap, we may automatically collect and store certain information in server logs. This may include:
 - details of how you used our service.
 - Internet protocol address.
 - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
 - cookies that may uniquely identify your browser or your Leap Account.
 - Location Information. When you use a location-enabled Leap service, we may collect and process information about your actual location, like GPS signals sent by a mobile device. We may also use various technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby Wi-Fi access points and cell towers.
 - Unique Application Numbers. Certain Services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Leap when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.
 - Local Storage. We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.
 - Cookies and Anonymous Identifiers. We use various technologies to collect and store information when you visit a Leap service, and this may include sending one or more cookies or anonymous identifiers to your device. We also use

cookies and anonymous identifiers when you interact with Services we offer to our partners, such as Leap features that may appear on other sites.

How We Use Information We Collect

To Provide Services To You. We use the information that we collect about you to provide, maintain, protect and improve the Services that Leap provides to you.

To Provide Enterprise Programs To You. We use the information that we collect about you to provide Services on behalf of an Enterprise Organization to you and the Enterprise Organization.

To Improve Our Services. We use de-identified, anonymous information that we collect about you for statistical and analysis purposes to improve our products and services, and to provide population statistical analysis and well-being trend information.

What Information We Share

We take your privacy seriously. We do not sell your Personal Information to any third parties and all information disclosed is the minimum amount necessary to fulfill the legitimate business purpose. We do not share Personal Information with companies, organizations and individuals outside of Leap except in the following circumstances:

- With Your Consent. We may share your Personal Information with companies, organizations or individuals outside of Leap when we have your consent to do so.
- As Part of an Enterprise Program. We may share your information according to the direction of your Enterprise Organization and any privacy policy and/or contractual requirements that they may ask us to comply with. Your Enterprise Organization may require Leap to share your Personal Information with the following:
 - Enterprise Organization. Under U.S. laws, we may share PFI. If you receive Services through your relationship with a non-US-based Enterprise Organization, we will adhere to the applicable laws in your country.
 - Banking, Savings and Loan and/or Financial Institutions. We may share information with your banking, savings and loan and/or other financial institutions.
 - Your Employer. We will not share your PFI with your employer for employment-related purposes. We may only share the information needed for your employer to deliver Enterprise Programs. For example, we may confirm your employment history and salary with your employer or confirm any information or documentation you provide from your employment and/or employer.
 - Third-Party Service Providers. We may disclose your PFI to our business associates who perform various functions on our behalf, but Leap requires these third parties to agree in writing to safeguard your PFI appropriately and in accordance with the law. Leap does not sell or rent your PFI to third parties. Leap

does not use your PFI to market, sell, or otherwise promote goods or services that are not loan and/or credit related services.

- For External Services. We may, from time to time, outsource some or all of the operations of our business to third-party service providers. In such cases, it may be necessary for us to disclose your data to those service providers. In some cases, the service providers may collect data directly from you on our behalf. We restrict how such service providers may access, use and disclose your data. We employ other companies and individuals to perform functions on our behalf. Examples include processing compensation, providing employee benefits, and performing legal and other professional services. These agents may have access to your data as needed to perform their functions, but they are not permitted to use it for other purposes.
- For Legal Reasons. We may disclose any data about you when, in our opinion, such disclosure is necessary to prevent fraud or to comply with any statute, law, rule or regulation of any governmental authority or any order of any court of competent jurisdiction.
- In a Transaction. As we continue to develop our business, we might sell or buy companies, subsidiaries, or business units. In such transactions, data generally is one of the transferred business assets but remains subject to the promises made in any pre-existing privacy statement (unless, of course, the person consents otherwise). Also, in the unlikely event that Leap or all of its assets is acquired, your data may be one of the transferred assets.

We may share aggregated, deidentified information publicly and with our partners to evaluate the effectiveness, value, and analytic trends of the Services. We may also disclose deidentified information with sponsor of Services provided to you in compliance with law and applicable confidentiality and security measures.

How We Protect Your Information

We work hard to protect Leap and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. Leap is committed to using industry-leading security practices such as ISO27001 and ISO27701. In particular:

- We comply with banking and financial institution security rules. For example, the Consumer Finance Protection Bureau ("CFPB").
- We encrypt many of our Services using SSL.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to Personal Information to Leap employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

We keep Personal Information housed on servers in the United States. If you are located outside of the United States, information we collect (including cookies) are processed and stored in the United States. By using the Services and providing information to us, you consent to the transfer to and processing of the information in the United States. The [adequacy decision on the EU-US Privacy Shield](#) was adopted on July 12, 2016 and the Privacy Shield framework became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes.

We store Personal Information for as long as required under applicable law. Where there is no legal, fiscal, administrative, or contractual requirement to retain the data for a longer or shorter period, data will be destroyed within five (5) years of its collection.

Transparency and Your Choices

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- Manage your email preferences in your Notifications settings.
- Control who you share information with through your Privacy settings.
- Take information out of many of our Services by contacting [Leap Customer Support](#).

Your Use After Termination of Enterprise Program. Upon termination by you or Leap of the relationship with your Enterprise Organization, you will have the opportunity, under certain Services, to continue to use your personal profile and to access information about yourself, including PFI provided by an Enterprise Organization, in that profile. In order for you to continue to access the personal financial information provided by your Enterprise Organization, you would need to execute a voluntary disclosure or authorization allowing Leap to receive and use your PFI. If you choose not to authorize Leap to receive such information about you, you may not be able to use some of the Services or features of the Services. Information that you were able to access as part of an Enterprise Program may no longer be available to you post-termination without such authorization. If you continue to use Services made available by Leap after termination of the relationship with your Enterprise Organization, your Leap account will continue to be governed by the Leap Terms and Privacy Policies.

Cookies. You may also set your browser to block all cookies, including cookies associated with our Services, or to indicate when a cookie is being set by us. However, it is important to remember that many of our Services may not function properly if your cookies are disabled. For example, we may not remember your location preferences.

Advertising. Unless you are receiving Services as part of an Enterprise Program, we also personalize your experience on our sites and mobile Services by showing you advertisements from Leap or our advertising partners that are tailored to your interests.

Information Shared By You. Many of our Services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines. Our Services provide you with different options on sharing and removing your content.

Accessing and Updating Your Personal Information. Whenever you use our Services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request. Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our Services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our Services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems. Access, correction, or deletion requests can be made by contacting [Leap Customer Support](#).

Other Helpful Information

Information of Children. The Services are not directed to or intended for use by minors. In compliance with laws, we will not intentionally collect any personal information from children under the age of 18. If you think that we have collected personal information from a minor child, please contact us.

When This Privacy Policy Applies

Our Privacy Policy applies to all of the Services offered by Leap Inc. and its affiliates, including Services offered on other sites, but excludes Services that have separate privacy policies that do not incorporate this Privacy Policy and Services that you may receive as a result of your participation in an Enterprise Program that expressly supersedes this Privacy Policy.

Our Privacy Policy does not apply to Services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Leap Services, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Compliance and Cooperation with Regulatory Authorities

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

California Privacy Rights

Residents of the State of California may have additional rights as set forth in our Privacy Notice for California Residents.

Other Jurisdictions

Other jurisdictions, including but not limited to the European Economic Area, provide certain additional rights regarding personal information, including the ability to request erasure, to restrict processing of your personal information, or for a copy of your personal information. In order to exercise your rights under these jurisdictions, [contact us](#) and provide us with sufficient information such as your name, address, any other information necessary for us to verify your identity. We reserve the right to request additional information from you, such as a photocopy of your passport or other identification card in order to verify your identity.

Changes to this Privacy Policy

Our Privacy Policy may change from time to time. This Privacy Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party. If we change this Privacy Policy, we will post any privacy policy changes on this page and, if the changes are material, we will provide a more prominent notice by sending you an email and/or posting a notice in the Services. Leap reserves the right to modify this Privacy Policy at any time, so please review it frequently.

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