

Privacy Policy

Effective date: 10/1/2022

At Klover, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your Personal Information. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Klover's Services is at all times subject to our [Terms and Conditions](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in our [Terms and Conditions](#).

You may print a copy of this Privacy Policy by clicking [here](#)

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Information that we gather when you access or use our Services. "Personal Information" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal data" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

Personal Information

Categories of Personal Information We Collect

This chart details the categories of Personal Information that we collect and have collected over the past 12 months:

<u>Category of Personal Information</u>	<u>Examples of Personal Information We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Information:</u>
Profile or Contact Data	<ul style="list-style-type: none"> • First and last name • Email • Phone number • Mailing address • Unique identifiers such as passwords 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Identifiers	<ul style="list-style-type: none"> • Cultural or social identifiers (for example, being a skateboarder, a Green Bay Packers fan, an environmental activist, etc.) 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Payment Data	<ul style="list-style-type: none"> • Payment card type • Credit or debit card number • Bank account information • Billing address, phone number, and email 	<ul style="list-style-type: none"> • Payment processors (who handle your full payment card number and other information) • Service Providers • Business Partners
Commercial Data	<ul style="list-style-type: none"> • Purchase history/transaction data • Consumer profiles • Records of personal property • SKU Data 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Device/IP Data	<ul style="list-style-type: none"> • IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services • Connection type (e.g. by cell phone or wifi) • Information about your mobile carrier 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners
Web Analytics	<ul style="list-style-type: none"> • Browsing or search history • Web page interactions (including with ads) • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Social Network Data	<ul style="list-style-type: none"> • User name 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners
Consumer Demographic Data	<ul style="list-style-type: none"> • Age / date of birth • Zip code • Gender • Race • Ethnicity • Sexual orientation • Political opinions • Religious beliefs 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners

	<ul style="list-style-type: none"> • Union membership • Psychographic Information • Research opinions 	
Professional or Employment-Related Data	<ul style="list-style-type: none"> • Job title 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information • GPS data 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners
Inferences Drawn From Other Personal Information Collected	<ul style="list-style-type: none"> • Profiles reflecting user attributes, behavior, preferences or abilities/aptitudes 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or other communications you send us 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners

Categories of Sources of Personal Information

We collect Personal Information about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
 - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
 - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- **Public Sources**
 - From the public social media posts, databases, or other sources.
- **Third Parties**
 - Vendors
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - We may use vendors to obtain information to create or enrich user profiles.
 - Advertising Partners

- We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
- Third Party Accounts Authorized by You
 - If you provide your credentials to any third party account (such as a social network account, linked retailers and financial institution (linked bank) via Plaid Inc.) to us or otherwise sign in to the Services through such third-party site or service, some content and/or information in or from those accounts may be transmitted to us.
 - The data related to your linked bank account(s) or credit or debit card(s) (a “Payment Credential”): account numbers and card transaction data collected and stored by our third-party providers (including credit and/or debit card transaction data collected by our third-party provider, Plaid, that covers the prior 24 months and all subsequent transactions until the account is unlinked from you’re your Klover account) bank fees and refunds, direct deposits, rent and/or mortgage payments, and bill payments (collectively, the “Transaction Data”). For more information on Plaid please see <https://plaid.com/legal/#consumers>
 - We also collect information in connection with retailers you link to Klover such as item or SKU-level data from purchases made. You have the ability to link other email accounts or digital loyalty accounts to your Klover account, as directed by you, through the use of your login credentials to such account(s) so that we, as your agent, can retrieve purchase information from digital receipts in your digital consumer account or email. In processing your digital receipt data, we may retrieve personal information such as name, payment method, billing address, mailing address, and other information contained in the digital receipt email.

Our Commercial or Business Purposes for Collecting Personal Information

- **Providing, Customizing and Improving the Services**
 - Creating and managing your account or other user profiles.
 - Processing orders or other transactions; billing.
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Services.
 - Improving the Services, including testing, research, internal analytics and product development.
 - Personalizing the Services, website content and communications based on your preferences.
 - Doing fraud protection, security and debugging.
 - Carrying out other business purposes stated when collecting your Personal Information or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- **Marketing the Services**
 - Marketing and selling the Services.
 - Showing you advertisements, including interest-based or online behavioral advertising.

- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Klover or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Klover or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Sell or Share Your Personal Information

We disclose your Personal Information to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Information. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security and fraud prevention consultants.
 - Analytics providers.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
 - Payment processors, including TaboPay, Inc. and Blue Ridge Bank, N.A.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
 - Ad networks.
 - Marketing providers.
 - Data aggregators or brokers.
- **Business Partners.** These parties partner with us in offering various services. They include:
 - Businesses that you have a relationship with.
 - Companies that we partner with to offer joint promotional offers, opportunities, or products or services with such as Blue Ridge Bank, N.A. if you participate in a Klover Visa Debit Card or Klover Consumer Deposit Account.
 - Other third parties who may advertise their products or services to you or that otherwise license or purchase your Personal Information from us.
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the Services.
 - Social media services.

- Other users.

Legal Obligations

We may share any Personal Information that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Information” section above.

Business Transfers

All of your Personal Information that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Information

We may create aggregated, de-identified or anonymized data from the Personal Information we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files — placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics

services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

- **Marketing Cookies.** Marketing Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements."

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors ("Interest-Based Ads"). Information for Interest-Based Ads (including Personal Information) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

Data Security and Retention

We seek to protect your Personal Information from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Information and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Information about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Information for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Information of Children

, We do not knowingly collect or solicit Personal Information about children under 18 years of age; if you are a child under the age of 18, please do not attempt to register for or otherwise use the Services or send us any Personal Information. If we learn we have collected Personal Information from a child under 18 years of age, we will delete that information as quickly as possible. If you believe that a child under 18 years of age may have provided Personal Information to us, please contact us at support@joinklover.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Information of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Information as a service provider, you should contact the entity that collected your Personal Information in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Information shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@joinklover.com.

Access

You have the right to request certain information about our collection and use of your Personal Information over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Information that we have collected about you.
- The categories of sources from which that Personal Information was collected.
- The business or commercial purpose for collecting or selling your Personal Information.
- The categories of third parties with whom we have shared your Personal Information.
- The specific pieces of Personal Information that we have collected about you.

If we have disclosed your Personal Information to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Information shared with each category of third party recipient. If we have sold your Personal Information over the past 12 months, we will identify the categories of Personal Information sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Information that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Information to provide you with the Services or complete a transaction or other action you have

requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Information which may include your account information, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Information provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Email us at: support@joinklover.com
- Submit a form at this address

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Personal Information Sales Opt-Out and Opt-In

In this section, we use the term ‘sell’ as it is defined in the CCPA. We sell your Personal Information, subject to your right to opt-out of these sales.

As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CCPA, sharing your data through third party Cookies for online advertising may be considered a “sale” of information. In addition, we may license or sell your Personal Information to third parties that may market their products or services to you. You can opt out of these sales by following the instructions in this section.

We sell your Personal Information to the following categories of third parties:

- Advertising Partners
- Certain Business Partners (as described in the “How we Share or Sell your Data” section)

Over the past 12 months, we may have sold the following categories of your Personal Information to categories of third parties listed above:

- Identifiers
- Payment Data
- Commercial Data
- Device/IP Data
- Web Analytics
- Consumer Demographic Data
- Professional or Employment-Related Data
- Geolocation Data
- Inferences Drawn From Other Personal Information Collected
- Other Identifying Information that You Voluntarily Choose to Provide

You have the right to opt-out of the sale of your Personal Information. You can opt-out using the following methods:

- You can complete the online form found here: [Do Not Sell My Personal Information](#).
- Email us at support@joinklover.com
- By broadcasting a “Do Not Track” or “Global Privacy Control (“GPC”)” signal. Please note that if we receive a GPC signal which conflicts with your existing profile settings with respect to our Services or your participation in our Points Program (described under “Our Financial Programs (Points Program))” below), we may confirm the change to your settings or your intent to opt-out from participation in our Points Program. Please note that your use of our website may still be tracked by Klover and/or our service providers.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sale of your Personal Information for at least 12 months.

To our knowledge, we do not sell the Personal Information of minors under 18 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may compensate you for the collection or sale of your Personal Information to participate in our [Points Program \(described below\)](#), which will give you access to various Klover offerings. As a result, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Information that we receive from you. More information regarding our financial incentive program can be found in the paragraph below.

Our Financial Incentive Program (Points Program)

As part of our Services, we offer financial incentives which can be accessed by participating in our [Points Program](#). By participating in our Points Program, we will offer Points as payment to you as compensation, for the collection of your Personal Information and/or the sale of your Personal Information. These Points will provide you access to various financial incentives, including cash advances. The value of your Personal Information to us is related to the value of the financial incentives or other benefits that you obtain or that are provided as part of our [Points Program](#), less the expense related to offering those products, services, and benefits to [Points Program](#) participants. By signing up to use our Services, you agree to

participate in our [Points Program](#). Additional information about our Points Program, including on ways you can revoke your participation, can be found at [here](#).

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@joinklover.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at support@joinklover.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Klover website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information or your choices and rights regarding such collection and use, please do not hesitate to contact us in the following ways:

- support@joinklover.com
- [Chat with us](#)