

Privacy Policy

Last Updated: November 14, 2022

Please note - This Privacy Policy includes important information about what you agree to by using Abound® Technology and we encourage you to read it carefully - feel free to use the table of contents below to jump to a specific section.

Abound (“Abound”, “we”, “our” or “us”) is on a mission to enable greater wealth and wellness for independent workers, resulting in increased retention, revenue, and compliance for those that serve them. Our developer-friendly API and complementary products (“Product”) lets businesses and financial institutions easily embed benefits into their products, setting aside enough to cover taxes, healthcare, retirement, insurance, and more. Together with our client businesses and institutions (“Clients”), we’re building a future that makes it easy for both the independent worker and the business consuming their services (“End Users”) to work together.

1. *Definitions

1.1 Clients - Direct customers of Abound

1.2 Developer Dashboard - web portal provided to Client's to perform activities such as but not limited to measuring product usage, debugging, submitting and tracking support tickets, API key management and defining access management.

1.3 End Users - Individuals accessing financial services with Abound® API embedded for functionality (can be once or twice removed depending on business structure of Abound's Clients)

1.4 Payer - Type of End User that is providing payment to independent workers through services utilizing the Abound® Product

1.5 Payee - Type of End User that is getting paid (as an independent contractor or self-employed business), withholding and/or utilizing tax, benefits or retirement services through services utilizing the Abound® product

1.6 Product - Represents Abound's complete Application Programming interface (API) and complementary solutions

1.7 Subscribers - Customers of Abound's direct customers in the event Abound is licensing to middleware providers

1.8 Website - Abound's marketing and landing pages

*In the event of a conflict between the definitions set forth in these Terms and your MSA, the definition in the MSA shall apply.

2. Overview

To support our Clients and their End Users, Abound collects and processes certain personal data about Clients and End Users, alike. This policy outlines the personal data we collect, use, and share; how we use and process that data; and how we commit to protecting it along the way. We'll keep it simple and straight to the point so you feel confident, but if you have any questions, you can always reach us at legal@withabound.com.

If you are a resident of California, you have special privacy rights granted to you under state law; please see our [California Privacy Addendum](#), which is incorporated into this policy by reference.

3. Data Collection

We may collect and use personal data in the course of providing Product to Clients, as outlined in our contracts with Clients and this policy. This includes Client-submitted information about End Users,

limited information about Clients and business contacts we interact with, and device data relating to a Client's integration with the Abound API. We additionally collect information from standard business channels, including users who sign up for Developer Dashboard, website visitors, and those who email us, including our support@withabound.com channel. Unless an end-user submits direct inquiries to us, we do not typically collect personal data directly from end users.

3.1 End User Data

3.1.i Data collected from Clients/Subscribers:

Abound collects personal data about End Users to enable Product functionality including, but not limited to, payments, tax services and benefits services.

Data collected varies based on whether the End User is providing payment ("Payer") or receiving payment ("Payee"). To make sure you understand not only what information may be collected, but what information is likely collected based on how you are interacting with Client offerings, we have broken out data collection tables for Payer and Payee.

End User - Payer Personal Data	Location of Data Collection		
	Website*	Developer Dashboard	API or complementary products
Payers legal name	No	No	Yes
Payers business entity information	No	No	Yes
Payers address	No	No	Yes
Payers phone number	No	No	Yes
Payers tax information including tax identification numbers (i.e. EIN)	No	No	Yes
Payers bank account information (account #, routing #)	No	No	Yes

End User - Payee Personal Data	Location of Data Collection		
	Website*	Developer Dashboard	API or complementary products
Payees legal name	No	No	Yes
Payees address	No	No	Yes
Payees business entity information	No	No	Yes
Payee's business financials (income, expenses, taxes)	No	No	Yes
Payee's tax information, including tax identification numbers	No	No	Yes

(i.e. SSN or EIN)			
Payee's date of birth	No	No	Yes
Payee's bank account information (account and routing number)	No	No	Yes
Payee's legal name	No	No	Yes
Payee's address	No	No	Yes

3.1.ii Data collected directly from End Users:

We collect basic information about website visitors (which may include End Users) such as IP address and device characteristics. Visitors may exercise opt out mechanisms with our analytics providers to control this interaction. End Users who contact us via email, website forms, phone number, or other designated channels may submit information such as name, email address, and basic contact info alongside their inquiry. Aside from these channels, we do not expect to have a direct relationship with End Users that results in personal data collection.

3.1.iii Device provided data

Each time a Client or End User accesses a Client interface that is using Abound® Product, we may receive limited personal data. We

receive similar data for visitors to our website and Developer Dashboard. This includes:

Device Provided Personal Data	Location of Data Collection		
	Website*	Developer Dashboard	API or complementary products
IP address	Yes	Yes	Yes
Geolocation information (approximate)	Yes	Yes	Yes
Hardware model	Yes	Yes	Yes
Web Browser system	Yes	Yes	Yes
Operating System	Yes	Yes	Yes
Services accessed (Abound products and features)	No	No	Yes
Other technology information about the device	Yes	Yes	Yes

3.2 Client data

Abound collects personal data from its Clients or Client's Customer's ("Subscribers" for middleware Clients) to support Product functionality offered to Client or Client End Users. Personal data that Abound may collect is listed below.

Client Personal Data	Location of Data Collection		
	Website*	Developer Dashboard	API or complementary products
Client legal and DBA business name	Yes	Yes	No
Client business entity information	No	Yes	No
Client address	No	Yes	No
Client EIN	No	Yes	No
Client Employee & Contractor Emails	No	Yes	No
Client Employee & Contractor Names	No	Yes	No
Client billing information	No	Yes	No
Client product usage logs	No	Yes	No
Client's POC email address	Yes	Yes	No

*Client personal data as collected by the website is subject to the discretion of the Client interacting with Abound's website. The outline of personal data collected is based on the assumption that Client interacts with the website in a predictable way - making a request, providing name, company and email only.

3.3 Inferences

Abound may make inferences based on the End User personal data provided in the API to support product features, business analytics, & ongoing development and enrichment of the platform. Examples of such inferences may include, but are not limited to, projected income, expense deductibility, projected tax liability, etc. We use this information, including any corrections made by Clients or End Users, to enhance our prediction algorithms. Enhancements to prediction algorithms, which take a form similar to weighted rankings, are incorporated into our Product(s). These non-personal enhancements are not purged or deleted upon termination of a client contract or deletion of the data that originally resulted in their generation.

3.4 Cookies

Abound® Products primarily use cookies to support authentication and session management for select Products including the Developer Dashboard. We do not use cookies for actively facilitating other partners to market to the End User.

Our website uses cookies, clear pixels (tracking pixels), and similar technologies to help us understand how users interact with our web properties so we can improve them, develop our business, diagnose errors, and help us identify companies who have expressed interest in our business. These technologies are designed to help analyze:

- Usage data, such as time spent on the website, links clicked, pages visited, language preferences, and the pages that led or referred you to our website.
- Online activities. We collect information about your online activities on Abound-managed websites and connected devices over time.
- Browser and device data, such as IP address, device type, operating system and internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Sites you are visiting.
- Information from user engagement with Abound marketing messages, including links clicked from Abound advertisements.

The providers we use for these services have been assessed for compliance with relevant privacy laws and provide users with opt-out and data deletion mechanisms. We configure these services to minimize collection of unnecessary personal information.

4. Data Use

At Abound, our primary mission is to empower the independent worker. To that end, we use End User data primarily to provide and maintain our Product, as well as to develop new Products which benefit independent workers.

4.1 End User Data

4.1.i Data collected from Clients/Subscribers:

Abound may use Client-provided End User data to:

- Operate, provide, maintain or modify Abound® Product
- Improve or expand Abound® Product through creation of anonymized financial models
- Develop new Service offerings
- Manage Client relationships, including carrying out our obligations, and exercising our rights, as per Client agreements
- Protect End Users, Clients, Abound and others from fraud, malicious activity, and other privacy and security-related concerns
- Investigate any misuse of our Service, including violations of Client policies, criminal activity, or other unauthorized access to our services
- Administer and protect the business
- Comply with applicable laws, lawful requests and legal processes

Abound does not market to End Users based on the personal information collected from the Abound® Product.

4.1.ii Data collected directly from End Users:

The Abound® Product is not designed to directly collect data from End Users. In the event an End User provides personal data to Abound (such as via email, or by submitting an inquiry via web form or designated phone number), Abound may use that data to assist the

End User and save limited business records surrounding handling of the request.

4.1.iii Device provided data

All End User personal data collected from devices is used to maintain functionality, performance, and security (regardless of point of contact: Website, Developer Dashboard or API).

4.2 Client data

Client personal data collected from the website is used to contact the client POC when responding to a client-initiated request originating from the website. End User personal data collected from the Developed Dashboard is used for Abound/Client relationship management.

5. Data Sharing

5.1 End User Data

Abound only shares End User data to the extent necessary to support the Product & fulfill contracted services provided to Clients.

Specifically, Abound may share information:

- With Client application, to support End User functionality
- With Client, to enforce Client contract with End User or as outlined in contract between Abound and Client
- With Data processors and other service providers, partners, or contractors in connection with the operation of and vital to Abound® Product
- With law enforcement, if we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy)
- Between and among Abound and our current and future parents, affiliates, subsidiaries and other companies under common control or ownership
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of End Users, Clients, our partners, Abound, and others

Abound may collect, use, and share End User Information in an aggregated, de-identified, or anonymized manner (that does not identify you personally) for any purpose permitted under applicable law. This includes creating or using aggregated, de-identified, or anonymized data based on the collected information to develop new products or services and to facilitate research.

Abound does not sell or rent End User data, or share it with others for the purpose of cross-context behavioral advertising.

5.2 Client User Data

Abound shares Client-provided personal data as required by Abound/Client Contract, by law and/or for reasonable business purposes. Specifically, Abound may share Client information:

- As outlined in Abound/Client contract
- With law enforcement, if we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy)
- Between and among Abound and our current and future parents, affiliates, subsidiaries and other companies under common control or ownership
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of End Users, Clients, our partners, Abound, and others

6. Retention Practices

Abound operates as a provider of contracted services to our Clients, who specify retention practices in their contracts. In the absence of overriding contract language, Abound retains data for the duration of contracted services and requires Clients to contact us at the termination of services to provide instructions regarding ongoing

retention or deletion of End User data. In the event that Client(s) fail to contact us to specify handling, we may begin to delete End User data from Abound systems 90 days after contract termination. Note that certain Abound services include interaction with the IRS, and certain files and information may be retained for a period of time after contract termination in support of best practices for End User or Client data management. End Users may contact Clients to learn more about specific data retention policy/practices.

7. Data Protection

To ensure Client and End User data is as safe as possible, Abound partners with best-in-class cloud service providers, evaluates all vendors and service providers that may interact with Client and End User data before use, encrypts all data in transit or at rest, and partners with SOC 2 auditors to annually review our security practices.. If you'd like to know more about security practices at Abound or have concerns about your security, please reach out to security@withabound.com - we'd be happy to help.

8. Location

Abound provides Product to US taxpayers only. To best serve our clients and their end users, all data is stored and processed within the United States of America.

9. Changes To This Policy

At Abound, we are always changing and growing and that means the occasional change to our policies. Any updates to this policy will be posted immediately with the date of the last update.

10. Use by Minors

We request that children not provide personal data through Abound's website. Further, Clients are not permitted to accept children's Personal Data through the Services, as the Products are not directed to minors, including children under the age of 13.

11. Contact Us

For questions, comments or concerns with Abound's Privacy policy, please contact us at legal@withabound.com. For Clients requesting more information, please reach out to your designated contact at Abound. For all other general inquiries, please feel free to contact us through the Abound website <https://www.withabound.com/company>.