JEEVES PRIVACY POLICY



About us

Jeeves is made up of different companies. The Jeeves companies that provide you with services depend on where you are located and are listed <u>here</u>.

About this Privacy Policy

We will collect your personal data when you use:

- our website at www.tryjeeves.com;
- the Jeeves app; or
- any of the services you can get access to through the Jeeves app or website.

Simply put, 'personal data', means information which can be used to personally identify you.

Under data protection law, as a controller of your personal data, we have responsibilities to protect your personal data and allow you to manage your own data. We take these responsibilities very seriously.

IMPORTANT INFORMATION

This Privacy Policy explains what information we collect and process about you so that you can make an informed decision about how you want to interact with our products and services. 'Process' is a fancy way of collectively saying use, collect, transmit, store, share, and erase.

If you have any questions about this policy or how we process your personal data you can contact our Privacy Team at privacy@tryjeeves.com.

Policy effective date: June 1 2022



This Privacy Policy contains details on:

- Your personal data
- How we use your personal data
- How we share personal data with third parties
- How we share personal data internationally
- Where we make automated decisions about you
- Security of your personal data
- How long we keep your personal data
- Your choices about your personal data
- Other important information about your personal data
- Updates and changes to this Privacy Policy
- How to contact us



Your personal data

The information we collect about you

We collect information about you directly from you and from other sources. The list below explains what personal data we collect and use.

We collect information you provide when you:

- fill in any application forms
- correspond with us
- register to use the Jeeves app
- open an account or use any of our services
- browse tryjeeves.com or use the dashboard available on tryjeeves.com
- use our iOS or Android mobile apps
- connect your other accounts to your Jeeves account
- speak with a member of our customer support team (either in person, on the phone or through the Jeeves app)
- contact us or interact with us for other reasons.

Information we collect when you apply for an account

If you are opening a Jeeves account, we need to process information about you, your business, and people associated with your business to create an account and to comply with our legal and regulatory obligations.

When you apply for an account, we will collect from you:

- Your name
- Your title or role on your team
- Your email
- Your phone number
- Your credit card spend amount
- Your password unique and strong
- Information related to your business, including the business's legal name, address, Employer Identification Number (EIN), and certain individuals who have an ownership interest in your business
- Business bank account information
- Other information about your identity such as copies of a passport, driver's license, or other national ID
- Your Tax Identification Number (TIN) or your Social Security Number (SSN) or equivalent

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In addition to the above, when you apply for an account we also need to collect the following:

- 1. <u>Information from third parties who help us provide our services and prevent fraud.</u> We will gather information from financial service providers, credit reference agencies, entity verification services, public sources, fraud prevention agencies and other sources. In this instance we collect:
 - Credit records
 - Information to help us check your identity
 - Information relating to your transactions
- 2. <u>Information to comply with regulatory and legal requirements.</u> As a business owner or an administrator on behalf of the business, or an individual with an ownership interest in the business, we will process your personal data to comply with the law. We receive this information from you and from third party verification services and other service providers. We will collect:
 - Your name
 - Your phone number
 - Your SSN
 - Your current or previous addresses
 - Your date of birth
- 3. <u>Information to underwrite your product.</u> To underwrite, provide you the highest credit limit possible, and determine your eligibility for Jeeves rewards, we collect information about your business's finances and access to your business's bank account. We use a service provider to process information about your business's bank account. When you link your bank account we process the bank account credentials and all information associated with the bank accounts associated with those credentials, including:
 - Unique identifiers associated with your bank
 - Account names
 - Bank account type
 - Transaction history and related information
 - Account balances
 - Bank routing and account numbers

If you do not link your bank account directly, we process information you provide with copies of your bank statements and other financial information about your business.

To link your bank account with your Jeeves account, a secure third-party service provider may use and store your bank account credentials. We do not store your bank account credentials on Jeeves systems.

4. <u>Information relating to rejected applications.</u> To comply with legal and regulatory obligations, we will keep certain personal data associated with applications for an account which we have rejected.

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Information we collect or generate when you use our products and services

When your business assigns you a Jeeves card or you use our products and services (for example as an employee or authorized representative) we will process:

- Your name
- Your business email
- Your business phone number

<u>When you make a transaction</u>. Each time you make a payment using a Jeeves card we receive information about your transaction. We may receive this information directly from you or from our financial partners or the card networks (such as Mastercard or Visa). We will process:

- Payment method information (card number, card type, PIN)
- Purchase amount
- Purchase date
- Purchase location
- Whether you made the purchase online or in a store
- Receipt information
- Information provided to us by the card network associated with transactions, merchants, or cardholders

Information we collect or generate when you link your Jeeves account

We offer the ability to connect your Jeeves account with accounting and expenses services (such as QuickBooks Online, Xero, and Netsuite) and other products and services provided by our business partners.

When you choose to link your Jeeves account with any such services, we will collect personal data from these services on your behalf in order to make the integrations work. The information we collect is based on the accounting service and the choices you make relating to that service but may include:

- Unique identifiers associated with the third-party connected account
- Information associated with your general ledger account
- General ledger account codes
- Locations
- Classes
- Departments
- Email address

Information we collect or generate when use our website or mobile app

Whenever you use our website or the Jeeves app, we collect the following information:

Technical information such as:



- IP address
- mobile and other hardware or device identifiers
- operating system details
- browser information
- referring and exit pages, including landing pages and pages viewed
- device event information, including crash reports, request and referral URLs and system activity details

Information about your use of our website or mobile app.

- Your location
- What you click on and what you type, time you spend on our websites, and other user experience information
- Photos from your mobile device that you choose to upload to us, such as photos of your receipts

Cookies and Trackers

• We use cookies to analyze how you use our website. Please read our <u>Cookie Policy</u> for more information about cookies

Information we collect when you interact with Jeeves teams

When you call, chat, email, or interact with members of Jeeves teams (such as Customer Support, Sales, or Marketing), we may collect information including:

- Your name
- Your email, phone number, or other contact information
- Content of your communications and survey responses

Information we collect when you enter into a sweepstakes, contest, or other promotion

We may process personal data when you enter a sweepstakes, contest, or promotion to administer those programs, including:

- Your name
- Your email, phone number, or other contact information
- Other personal data required for you to participate

Information we collect or generate as a result of a business partnership, referral, or agreement

We enter into agreements with financial partners and other businesses that provide products and services related to ours, and as a result of these partnerships, Jeeves may receive personal data related to that particular business or partnership. We may collect information about:

- You and your relationship with the business partner
- Your email or other contact information
- Your membership or relationship status with the business partner



How we use your personal data

We will only process (i.e. use) your personal data when the law allows us to, that is, when we have a legal basis for processing. Our legal basis will be one of the following:

· Keeping to our contracts and agreements with you

We need certain personal data to provide our services and cannot provide them without this personal data.

Legal obligations

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

· Legitimate interests

We sometimes collect and use your personal data because we have a legitimate interest to use it and this is reasonable when balanced against your right to privacy.

Consent

Where you've agreed to us collecting your personal data, or your sensitive personal data, for example when you have ticked a box to indicate that you are happy for us to use your personal data in a certain way.

How we use your personal data and our lawful basis

We process your personal data for the reasons listed below. Please note that the lists of processing activities included in this section are not exhaustive. They are illustrative of the different types of processing that we may undertake.

We use your personal data to:

Provide Services to you

- Communicate with you about your products and services by phone, text, email, or chat
- Communicate with you and respond to your specific requests or questions
- Manage and send you notifications, confirmations and important information about your Card and our products and service
- · Help identify and troubleshoot problems with your account
- Provide you with tailored recommendations
- Facilitate business relationships
- Comply with contractual obligations
- Determine eligibility for, calculate, and provide Jeeves rewards
- Provide you with support

Legal Basis

Keeping to our contracts

Legal obligations

Legitimate interests (to meet our obligations and provide you with good products and services)



Protect against fraud

- Comply with our regulatory, legal, and compliance obligations
- Monitor, prevent, and detect fraud or unauthorized activity
- Compare information for accuracy and verify it with other data sources
- Understand your business' financial circumstances and manage fraud risks related to your Jeeves account
- (If you elect to share information about your geolocation) to enhance the security of our products and services and to prevent fraud

Legal obligations

Legitimate interest (develop and improve how we deal with financial crime and meet legal responsibilities)

Market and provide new products and services

- Advertise or market services and products to you
- Communicate with you about the products and services by phone, text, email, or chat
- Survey your opinions through surveys or questionnaires
- Understand how you use our services so we can make enhancements or improvements

Legitimate interests (send b2b marketing, develop products and services)

Consent (where we are legally required to get your consent for b2b marketing)

To keep our services up and running

- Secure our systems and products help keep our website and the Jeeves app safe and secure
- To identify, fix, and troubleshoot bugs and errors

Keeping to contracts and agreements between you and us

Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you)

Consent (where required by law)

Preparing anonymous statistical datasets (Anonymous)

 To better target advertisements, improve, and market our products and services, and for other promotional purposes, we may reasonably transform personal data into de-identified information removing or masking information that could be used to identify you and by aggregating or combining de-identified data with other information Legitimate interests (to conduct research and analysis, including to produce statistical research and reports)

Improve our products and services

 Manage, operate, and improve the performance of our products and services Legitimate interests (to understand how our products are used so we can develop new products and improve the products we



	currently provide)
 Meet our legal obligations and enforcing our rights Mitigate financial loss, claims, liability, and other harm to our users, Jeeves, our partners, or third parties Facilitate reporting and auditing 	Legitimate interests (for example, to protect Jeeves during a legal dispute) -

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us at privacy@tryjeeves.com if you need details about the specific legal basis we are relying on to process your personal data.



How we share personal data with third parties

For the purposes set in the above section (How we use your personal data), we share your personal data with:

- our group companies;
- professional advisors (including lawyers, accountants and auditors);
- legal and regulatory authorities; and
- taxation authorities.

We also share your personal data with other parties which provide products or services to Jeeves (for example, Google Suite, Hubspot, our benefits providers). These third parties may also be controllers of your personal data and your personal data will be processed in accordance with the third party's privacy policy.

Personal data will be shared with third parties as follows:

Sharing for business purposes only

Jeeves provides personal data to other companies to improve our products and services, to operate our business, and to help Jeeves market to potential customers. We may share all of the categories of information listed in this Privacy Policy with other companies:

- To operate Jeeves's products and services or support general operations of Jeeves's business;
- To integrate the products and services of our business partners with your account; and
- To use cloud services to host our website and store the information we process about you.

We may disclose your personal data if it is either required by law or we determine that disclosure is reasonably necessary to enforce our rights, protect our property or operations, or enforce the rights and protect the property or operations of our business partners and customers.

Sharing for payment purposes

We share some personal data about you, such as your name and information about the payment method, with the person or merchant that you are paying.

Sharing anonymous or aggregated information

We may share anonymized, de-identified, or aggregated information, or other data that does not directly identify you or your business, with other parties.

Sharing with Jeeves' affiliates

Jeeves Inc. may share personal data we process about you with other Jeeves companies and our affiliates to provide additional services to you, determine eligibility for new products and offers, and for other legitimate business interests.



Sharing with service providers

We share your personal data with our service providers who operate and provide services on our behalf. These service providers need access to your personal data to perform information processing, manage or enhance our customer information, tailor services to you and your preferences, and perform other services related to our business.

Sharing with Jeeves financial and business partners

We share personal data to facilitate the services we provide to you with our business and financial partners.

Sharing with card issuing and payment method partners

Jeeves partners with financial institutions to issue Cards and provide other payment methods to you. Jeeves owns and controls the transaction data and other personal data we share with these partners. We share the personal data you provide with your application for an account with our partners to comply with our contractual obligations and to facilitate compliance with their and our regulatory obligations.

Sharing with credit reporting agencies

We share your business information with credit reporting agencies to verify information about your business and to report on your business's performance, which in some cases may contain personal data.

Sharing with card network partners

Mastercard or Visa separately processes information related to your use of your Cards. For more information on how Mastercard and Visa handle your personal data, please visit <u>Mastercard's Global Privacy Notice</u>, respectively.

Sharing to facilitate partnerships and referrals

We share personal data to facilitate referral partnerships. For example, if you were referred to us through an organization we may provide confirmation to that organization that your business opened an account with us, and information relating to your account activity solely for the purpose of calculating any referral fees we owe related to the referral.

Sharing authorized by you, your users, administrators, or authorized representatives

We continually enhance our products and services by integrating with products and services provided by other companies. For these integrations to work and with your explicit consent, we may need to share your personal data with them. Information we share with these companies will be used and disclosed according to that company's privacy policy. You should review the privacy policy of any company that has access to your personal data related to the integration with your account.



Sharing for accounting and expenses integrations

We offer integrations with many popular accounting services (such as QuickBooks Online, Xero, and Netsuite). We share information with those services solely as directed by you, your users, or authorized representatives.

Sharing for corporate transactions

In the event of a corporate sale, merger, financing, reorganization, dissolution, bankruptcy, or similar event, personal data and data we process from you may become part of the assets we transfer or share in preparation for any such transaction. Any acquirer or successor of Jeeves may continue to process personal data consistent with this Privacy Policy.

Sharing for compliance or compelled disclosure

We may share personal data:

- To comply with applicable law, regulation or payment network rules
- To enforce our contractual rights
- To protect the rights, privacy, safety and property of Jeeves, you, our customers, our business partners, or others
- To respond to requests from courts, law enforcement agencies, regulatory agencies, and other
 public and government authorities, which may include authorities outside your country of
 residence.



How we share personal data internationally

In order to provide our services we may need to transfer your personal data to locations outside the jurisdiction in which you provide it or where you are viewing the website for the purposes set out in this Privacy Policy. This may include a transfer of your information from a location within the European Economic Area (the "**EEA**") or United Kingdom ("**UK**") to outside the EEA or UK, or from outside the EEA or UK to a location within the EEA or UK.

The level of information protection in countries outside the EEA and UK may be less than that offered within the EEA and UK. Where this is the case, we will implement appropriate measures to ensure that your personal data remains protected and secure in accordance with applicable data protection laws. Where our third party service providers process personal data outside the EEA and UK in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

If you would like more information on how we protect your data when it is transferred across borders please contact us by sending an email to privacy@tryjeeves.com.



Where we make automated decisions about you

Depending on the Jeeves products or services you use, we may make automated decisions about you.

This means that we may use technology that can evaluate your personal circumstances and other factors to predict risks or outcomes. This is sometimes known as profiling. We do this for the efficient running of our services and to ensure decisions are fair, consistent and based on the right information. For example, we may make automated decisions about you that relate to:

- Opening accounts
- KYB, anti-money laundering and sanctions checks
- identity and address checks
- detecting fraud
- monitoring your account to detect fraud and financial crime.

Our legal basis is one or more of the following:

- keeping to contracts between you and us
- legal obligations
- legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities).

You can find out more about this in the <u>'Your choices about your personal data'</u> section below. Where we make an automated decision about you, you have the right to ask that it is manually reviewed by a person.



Security of your personal data

We are committed to ensuring that your personal data is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We have put in place organizational, technical, and administrative measures to protect your personal data; however, no data security program is entirely secure. Please contact us immediately if you believe that your personal data or any other confidential information that you have provided to us is no longer secure or has been lost or stolen.

How long we keep your personal data

We will keep your personal data for as long as necessary to fulfill the purposes described in this notice or in the terms of any contract that we enter into or for as long as we are required by law or in order to comply with a regulatory obligation. After this, where allowed by laws and this notice, we will erase your personal data.

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Your choices about your personal data

Your legal rights and choices

If you are an employee of a business that holds a Jeeves account, the business, rather than Jeeves, is responsible for helping you with your request.

If Jeeves is responsible for helping with your request, we may not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right does not apply to the particular information we hold about you).

Your right	What it means
You have the right to be told about how we use your personal data	We provide this Privacy Policy to explain how we use your personal data. If you ask, we will provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.
You can ask us to correct your personal data if you think it's wrong	You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.
You can ask us to delete your personal data	You can ask us to delete your personal data if: I there's no good reason for us to continue using it Jou gave us consent (permission) to use your personal data and you have now withdrawn that consent Jou have objected to us using your personal data we have used your personal data unlawfully the law requires us to delete your personal data Only an account owner may ask us to delete Jeeves business account data. Just to let you know, we may not be able to agree to your request. Under regulation we must keep certain customer personal data even when you ask us to delete it. We may not be able to delete your entire file because these regulatory responsibilities take priority. We will always let you know if we can't delete your personal data.

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You can object to us processing your personal data for marketing purposes	You can tell us to stop using your personal data, including profiling, for marketing.
You can object to us processing other personal data (if we are using it for legitimate interests)	If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object. However, if there is an overriding reason why we need to use your personal data, we will not accept your request. If you object to us using personal data which we need in order to provide our services, we may need to close your Jeeves account as we won't be able to provide the services.
You can ask us to restrict how we use your personal data	You can ask us to suspend using your personal data if: ✓ you want us to investigate whether it is accurate ✓ our use of your personal data is unlawful but you do not want us to delete it ✓ we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim ✓ you have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it
You can ask us to transfer personal data to you or another company	If we can, and are allowed to do so under regulatory requirements, we will provide your personal data in a structured, commonly used, machine-readable format.
You can withdraw your permission	If you have given us any consent we need to use your personal data, you can withdraw your consent at any time by sending an email to privacy@tryjeeves.com (Please note, it will have been lawful for us to use the personal data up to the point you withdraw your permission).
You can ask us to carry out a human review of an automated decision we make about you	If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.

Choices relating to electronic communications

You may choose not to receive promotional emails from us by following the unsubscribe/opt-out instructions in those emails, but we may still send you non-promotional messages relating to information about our products and services such as updates to our platform agreement, privacy notices, security alerts, and other notices relating to your access to or use of our products and services.



Choice to delete or close your account

You can close your account at any time per the terms set out in the terms and conditions or other agreement we have with you. If you are an account administrator, please contact Customer Support to close your account, otherwise please contact your business's administrator to have your access to Jeeves cards deleted.

Subject to country specific laws, closure or deletion of your account will mean that you permanently lose access to the account, personal data, and data associated with the account. Certain personal data or de-identified information associated with your business's account may nonetheless remain on systems owned or maintained by Jeeves where required to comply with the law or our contractual obligations.

How to exercise your rights

You may exercise any of your rights at any time using the email 'privacy@tryjeeves.com'. Please note that, If you are an employee of a business that holds a Jeeves business account, and your request relates information we hold relating to account creation and/or use you will need to contact that business to exercise your rights.

<u>Free of charge:</u> You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

<u>Confirmation of identity:</u> We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

<u>Timeline for response:</u> We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

<u>Complaints:</u> If you are unhappy with how we have handled your request you can contact our Privacy Officer using <u>privacy@tryjeeves.com</u>. You also have the right to raise a complaint directly with a supervisory authority. In the United Kingdom, this is the <u>Information Commissioner's Office</u>. In Brazil this is the <u>Autoridade Nacional de Proteção de Dados</u>.



Other important information about your personal data

Use by minors

If you are under the age of 16, you may not have an account or use our products or services. We do not knowingly process any information from, or direct any of our products or services to children under the age of 16. Please do not provide us with any personal data related to children under the age of 16.

Personal data related to administrators, employees, company owners, and authorized persons

In some circumstances, we require you to provide us with personal data relating to another person (such as providing us with personal data about the owners of your business during the application process or providing us with personal data about your employees). Do not provide us with any personal data unless you have obtained consent of these persons or you are sure the disclosure of the personal data is otherwise permitted by law. You must inform all other persons whose information you share with us how we process personal data and all other terms of this Privacy Policy.

Account Users

Our products and services are intended for use only by businesses, and you may only use an account, card, or payment method if you are an employee or other authorized representative of a business that has opened an account.

The business's administrator is responsible for the account, cards, and payment methods associated with that business.

An administrator can: restrict, suspend, or terminate your access to or ability to use the services, access personal data about you, access or retain information stored with us, and restrict your ability to edit, restrict, modify, or delete information associated with your use of our products and services.



Changes to this Privacy Policy

We may make minor updates to this Privacy Policy, and we encourage you to visit this site from time to time to be aware of and review any updates. We will post any changes to this Policy on our Site. If we make any changes to this Policy that materially affect our practices with regard to the personal data we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site.

By the way, we'll update this Policy and accompanying notice every 12 months and let you know when we've made updates consistent with our Privacy Policy.

Our previous privacy policies are as follows:

Jeeves Privacy Policy August 13, 2021

Contacting Us

If you have concerns, questions, or would just like to better understand our privacy practices at Jeeves, please send an email to our privacy team: privacy@tryjeeves.com



Jeeves Entities

The Jeeves group is made up of different companies.. We will let you know which Jeeves company you have a relationship with when you first apply for or use a Jeeves product or service.

Jeeves Inc. is the provider of all services and controller of your personal information relating to Jeeves products, accounts, web services, rewards etc. Jeeves Inc. is registered in the USA and our address is 924 N. Magnolia Avenue, Suite 202, PMB 1075, Orlando, FL 32803.

If you are a Jeeves customer and you are based in **Brazil**, Jeeves Financial Brazil Ltda. and Jeeves Inc. are responsible as controllers of your personal data.

If you are a Jeeves customer and you are based in **Canada**, Jeeves Technologies (Canada) Inc. and Jeeves Inc. are responsible as controllers of your personal data.

If you are a Jeeves customer and you are based in **Chile**, Jeeves Chile SpA and Jeeves Inc. are responsible as controllers of your personal data.

If you are a Jeeves customer and you are based in **Columbia**, Jeeves Technologies Colombia SAS (formerly known as TryJeeves Colombia S.A.S.) and Jeeves Inc. are responsible as controllers of your personal data

If you are a Jeeves customer and you are based in the **EEA**, JVS Technologies Europe Limited and Jeeves Inc. are responsible as controllers of your personal data.

If you are a Jeeves customer and you are based in **Mexico**, JVS Inc. México S.A. de C.V. and Jeeves Inc. are responsible as controllers of your personal data.

If you are a Jeeves customer and you are based in the **UK**, Jeeves Technologies UK Itd and Jeeves Inc. are responsible as controllers of your personal data.