

California Privacy Statement

This California Privacy Statement is for California Residents only. This policy describes the personal information that **Pathward Financial, Inc. and Pathward, National Association** (collectively, “Pathward Entities”) (“we,” “our,” or “us”) collects in the course of its business, explains how this information is collected, used, shared, and disclosed, describes rights provided by the California Consumer Privacy Act of 2018 (“CCPA”) to California Residents (“consumers” or “you”) regarding their personal information, and explains how consumers can exercise those rights.

The CCPA does not apply to certain personal information, including, for example:

- Personal information covered under certain federal or state privacy laws, including but not limited to the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, the Health Insurance Portability and Accountability Act, and the California Financial Information Privacy Act. For more information, please visit www.pathwardprivacypolicy.com to view our Gramm-Leach-Bliley Act privacy notice.
- Personal information you provide us when acting in other capacities, such as a job applicant, employee, or independent contractor (“Employee Consumers”), or as a representative of another business (such as a service provider, vendor, or other entity that we do business with) (“Business Consumers”). For more information on your rights under the CCPA when acting in other capacities, please contact us at 833-898-0023 or Privacy Department, 5501 S. Broadband Lane, Sioux Falls, South Dakota 57108.

Personal Information We Collect, Use, Share, or Disclose

The CCPA requires us to disclose certain information regarding our collection, use, sharing, and disclosure of personal information.

In this Privacy Statement, personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“Personal Information”). “Personal Information” does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information.

Collecting Your Personal Information

In the past 12 months, we may have collected the following categories of Personal Information for you, for example, when we provide you our Services or you contact us with inquiries or other requests:

- **Direct Identifiers.** This may include your name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.
- **Identity Verification Information.** This may include you Social Security Number, driver’s license number, passport number, or similar government identifiers, driver’s license and other government identification documents (which may contain document numbers, birth date, gender and photo).
- **Financial Information.** Payment or banking information including credit card number, name on credit card, expiration date, security code and billing address, and information required for financing purchases, such as social security number, name and contact information.
- **Health-Related Information.** This may include information about a health condition or medical history as part of your use of the Services, including health insurance information.
- **Characteristics of Protected Classification under California or Federal Law.** This may include age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Commercial Information.** This may include records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- **Internet or Other Similar Network Activity.** This may include browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement, such as your clicks and how long you are using our website. We may also collect Internet Protocol (IP) address through your use of our Services and website.
- **Geolocation Data.** This may include physical location or movements.
- **Professional or Employment-related Information.** This may include current or past job history or performance evaluations.

In the past 12 months, we have collected Personal Information from the following categories of sources:

- Applicants for our products or services
- Visitors to our website including those who complete forms on our website
- Data analytics providers
- Outside referral sources and brokers
- Other financial institutions such as third party financiers
- Cloud based third party loan management system (PBS)

Using Your Personal Information

We may collect your Personal Information for the following legitimate business or commercial purposes:

- **Account Services:** We collect a small segment of identifiers from website visitors who submit inquiries and provide that information. That information is used to answer inquiries. More extensive consumer information could be collected from inquiries for financing. In addition, we may collect Personal Information to: (1) establish, maintain, support, and service an account you may have opened with us and for which you provided the information or that you may have applied for or established with us; (2) provide services, products, or information you may have requested from us; and (3) perform services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, or providing similar services on our own behalf or on our service provider's behalf.
- **Advertising and Marketing Services:** To offer new financial products and services to you in the future.
- **Security and Fraud Detection:** To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity.
- **Improvement of Products and Services:** To enhance the quality of our products and services.
- **Internal Research:** To research for technological development and demonstration.
- **To Comply with our Legal Obligations.**
- **Audits:** To perform audits, including reviewing past and current interactions with you and related transactions.
- As part of a **Merger/Acquisition/Bankruptcy or Other Transaction.**
- **For Other Business or Commercial Purposes,** as permitted by law.

Disclosing Your Personal Information for a Business or Commercial Purpose

We may disclose your Personal Information to service providers and third parties in order to carry out specific business or commercial purposes. In the preceding 12 months, we may have disclosed the following categories of Personal Information to service providers and the following categories of third parties:

- **Identifiers** to Affiliates, Marketing Partners, Loan Servicers, Other Financial Institutions such as Other Financial Institutions such as Third Party Financing Partners, Processors, Customer Identification Program Vendors, Webform Vendors, Customer Service Providers, and Card Fulfillment Providers.
- **Commercial information** to Affiliates, Third Party Financers to provide requested financing, and Loan Servicers.
- **Internet or other similar network activity** to Affiliates.
- **Geolocation data** to Affiliates.

- **Professional or employment-related information** to Affiliates, Loan Servicers, and Other Financial Institutions such as Third Party Financers.

In the preceding twelve (12) months, we have not sold any Personal Information. In addition, we do not sell Personal Information. We do not collect Personal Information from minors under the age of 16. As such, we do not to sell Personal Information of minors under 16 years of age and we have no actual knowledge of doing so.

Your Rights under the CCPA

As described in more detail below, the CCPA provides you with certain rights regarding the collection, use, sale, and disclosure of your Personal Information. As we noted above, because the Pathward Entities do not sell Personal Information, we have not included a description of the right to opt out of the sale of Personal Information. If you have any questions regarding our sharing practices, please call us at 833-898-0023 or contact us Privacy Department, 5501 S. Broadband Lane, Sioux Falls, South Dakota 57108.

The Right to Know About Personal Information Collected, Used, Sold, Shared, or Disclosed

You have the right to request that we provide you with certain information about the Personal Information we collect, use, sell, share, or disclose about you as well as the categories and specific pieces of information that we have collected about you in the 12 months before you submit a request, including:

- The **specific pieces of Personal Information** we have about you.
- The **categories of Personal Information** we have collected about you, including:
 - The categories of Personal Information we have collected about you in the past 12 months.
 - The categories of sources from which the Personal Information about you was collected.
 - Our business or commercial purpose for collecting your Personal Information.
 - If we shared your Personal Information:
 - The categories of Personal Information that we disclosed about you for a business purpose in the past 12 months and, for each category identified, the categories of third parties to which we disclosed that particular category of Personal Information; and
 - The categories of third parties that we share Personal Information.
 - If we sold your Personal Information, which we do not do:
 - Our business or commercial purpose for selling your Personal Information.
 - The categories of your Personal Information that we have sold about you in the past 12 months and, for each category identified, the categories of third parties to which we sold that particular category of Personal Information.

However, there is certain information that we will not disclose to you. This information includes but is not limited to your Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, and security questions and answers.

The right does not apply to Employee and Business Consumers.

The Right to Request Deletion of Personal Information

You have the right to request that we delete any Personal Information that we have collected from you and maintained about you. Once we receive and confirm your request, if we determine that we must comply with a deletion request and delete your Personal Information from our records, we will also direct any service providers we work with to also delete your Personal Information from their records. If we store any of your Personal Information in our archived or back-up systems, we will delete your information once the systems are accessed, restored, and/or used.

Please note that we may deny your deletion request as is permissible under the CCPA.

This right does not apply to Employee and Business Consumers.

The Right to Nondiscrimination

We will not discriminate against you for exercising any of your CCPA rights. For example, unless otherwise permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

However, the Pathward Entities may require use of your Personal Information to provide access to the Services. Therefore, when you exercise your deletion rights, in particular, you may lose access to certain aspects of the Services that require your Personal Information.

This right does not apply to Employee and Business Consumers.

Submitting a Request to Know or Request to Delete Personal Information

To exercise your Right to Know or your Right to Delete Personal Information, please submit a request to us by either:

- Calling us at 833-898-0023
- Mailing us at Privacy Department, 5501 S. Broadband Lane, Sioux Falls, South Dakota 57108

To submit a request, you (or your authorized agent) will be asked to provide us with your account number and name, or other identifying information, for us to verify with information in our system.

Only you (or an authorized agent) may make a request.

Once we receive your request, we will respond to your request within the time and in the manner required by applicable law and provide you with additional information about how we will process the request.

Verifying Your Identity

Once you submit your request, we will verify your identity by matching the information you provided us with information in our systems. Specifically, we will verify your identity in the following ways:

- **Password-Protected Accounts:** If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. We will also require you to re-authenticate yourself before we delete your Personal Information. If we suspect fraudulent or malicious activity on or from your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the Personal Information.
- **Non-Account Holders:** If you do not hold a password-protected account with us, we will request you provide us with your account number, name, and date of birth, or other identifying information, which we will match with information in our system to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose Personal Information is the subject of the request.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you,

which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new Personal Information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA.

If we are unable to verify your identity, we will deny your request and send you a letter or email explaining why we were unable to verify your identity.

Please note that we are only required to respond to your request for access to your Personal Information twice within a 12-month period.

If our verification process is successful, we will respond to your request within the time and in the manner required by applicable law.

We will not charge you to verify your identity. In addition, we will not charge you or your authorized agent a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Authorized Agent for Requests

You may designate an authorized agent to make a request on your behalf. Unless you have a power of attorney, if you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request, you must provide the authorized agent with written and signed permission to do so, and verify your own identity directly with us or directly confirm that you provided the authorized agent with permission to submit the request. We may deny a request from an authorized agent that does not submit proof that they are authorized to act on your behalf.

Changes to Our California Privacy Statement

We are required by law to update this California Privacy Statement at least once each year. This California Privacy Statement was last updated on July 11, 2022.

Contact Information

If you have any questions regarding our privacy policies, our California Privacy Statement, the ways in which we collect, use, and disclose your Personal Information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Phone: 833-898-0023

Mail: Privacy Department, 5501 S. Broadband Lane, Sioux Falls, South Dakota 57108