

Stasher Inc. Privacy Policy

This Privacy Policy describes the policies and procedures of Stasher, Inc. on the collection, use and disclosure of your information on www.stasherapp.com (the “Site”) and the services, features, content or applications we offer (collectively with the Site, the “Services”). We receive information about you from various sources, including: (i) your use of the Services generally; and (ii) from third party websites and services. We follow this privacy policy in accordance with local law in the places where we operate. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

What Does This Privacy Policy Cover?

This Privacy Policy covers the treatment of personally identifiable information (“Personal Information”) gathered when you are using or accessing the Services. This Privacy Policy also covers our treatment of any Personal Information that our business partners share with us or that we share with our business partners.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and applications (“Third Party Services”) that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

What Information Do We Collect?

The information we gather enables us to personalize, improve and continue to operate the Services. We collect two basic types of information – personal information and anonymous information - and we may use personal and anonymous information to create a third type of information, aggregate information. We collect the following categories of information **from those users at least 13 years of age**:

- Registration information you provide when you create an account, including your first name and surname, country and state of residence, gender, date of birth, email address, username and password
- Transaction information you provide when you register or update your account, whether on our site or through our application, including your postal address, phone number, bank account information and payment information.
- Information you provide to us when you use our site and application, or our application on third-party sites or platforms such social networking sites.

- Location information when you visit our sites or use our application, including location information either provided by a mobile device interacting with our site or application, or associated with your IP address, where we are permitted by law to process this information.
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our site, use our application on third-party sites or platforms or open emails we send.
- Third party credentials such as certain passwords, usernames, account numbers, and other account information for third party sites and services.
- Information from third party sites that we may collect on your behalf so that we can display information to you through our Services, which includes your account and other personal information from third party sites that you register under your account via our Services. For example, if you register your Chase account with us, we will aggregate your Chase information via our application in order to present it to you.

Some features of the Services allow you to provide content to the Services. All content submitted by you to the Services may be retained by us indefinitely, even if and after your access to the Services is terminated. We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

- Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

How Do We Collect Your Information?

- We collect information you provide to us when you request products, services or information from us, register with us, participate in public forums or other activities on our site and application, respond to customer surveys, or otherwise interact with us.
- We collect information through technology, such as cookies, Flash cookies and Web beacons, including when you visit our site and application or use our application on third-party sites or platforms.
- We acquire information from other trusted sources to update or supplement the information you provided or we collected automatically. Local law may require that you authorize the third party to share your information with us before we can acquire it.

We collect statistical information about how users, collectively, use the Services. Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, or your web browser.

Use of Your Information by Stasher

A member of Stasher will be the data controller for your information. Other members of Stasher may have access to your information where they perform services on behalf of the data controller(s) (as a data processor) and, unless prohibited under applicable law, for use on their own behalf (as a data controller) for the following purposes:

- Provide you with the products and services you request
- Communicate with you about your account or transactions with us and send you information about features on our site and application or changes to our policies
- Consistent with local law and choices and controls that may be available to you:
 - Send you offers and promotions for our products and services or third-party products and services
 - Personalize content and experiences on our site and application
 - Provide you with advertising based on your activity on our site and application and on third-party sites and applications.
- Optimize or improve our products, services and operations
- Detect and protect against errors, fraud, or other criminal activity

In order to allow you to use certain Services, we may be required to verify your identity. To do so, we may, directly or through third parties, use information you provide to verify information you provide against third party databases or through other sources. We may also use your information to verify your identity in the event you contact us for assistance with the Site or Services.

In connection with the Services, we may use information you provide on your funding accounts to complete transactions you request, to verify the existence and condition of your funding accounts, or to assist with the posting of a payment with a payee. We may use information you provide regarding a payee if you ask us to assist with posting of a payment at such payee.

We may use your information to pre-fill fields on the Site and application for your convenience.

We may use the bank account and credit card information you provide to confirm your accounts are valid to access funds from your accounts pursuant to your instructions in connection with our Services.

We may use your information you provide to make payments on your behalf if you participate in our Services. For example, we will use the information you provide to verify your account and that of a designated payee and to route payments to that payee pursuant to your instructions, and we will use your payment account details to access the funds in your specified payment account in order to make the payment that your request to be paid to that payee.

How We Disclose Personal Information

We will not share your personal information outside except in limited circumstances, including:

- When you allow us to share your personal information with another company, such as:
 - Electing to share your personal information with carefully selected companies so that they can send you offers and promotions about their products and services
 - Directing us to share your personal information with third-party sites or platforms, such as social networking sites

In connection with our Services, we may share some of your personal information with third parties you are attempting to pay in order to process the transaction you have requested.

Please note that once we share your personal information with another company, the information received by the other company becomes subject to the other company's privacy practices:

- When we cooperate with financial institutions to offer co-branded products or services to you; however, we will do so only if permitted by applicable law and, in these cases, the financial institutions are prohibited from using your personal information for purposes other than those related to the co-branded products or services
- When companies perform services on our behalf, like package delivery and customer service; however, these companies are prohibited from using your personal information for purposes other than those requested by us or required by law
- When we share personal information with third parties in connection with the sale of a business, to enforce our Terms of Use or rules, to ensure the safety and security of our guests and third parties, to protect our rights and property and the rights and property of our guests and third parties, to comply with legal process or in other cases if we believe in good faith that disclosure is required by law

Your Controls and Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete your registration account
- You may change your choices for subscriptions, newsletters and alerts
- You may choose whether to receive from us offers and promotions for our products and services, or products and services that we think may be of interest to you

- You may choose whether we share your personal information with other companies so they can send you offers and promotions about their products and services
- You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers
- You may request access to the personal information we hold about you and that we amend or delete it and we request third parties with whom we have shared the information do the same

You may exercise your controls and choices, or request access to your personal information, by visiting your Account or following instructions provided in communications sent to you. Please be aware that, if you do not allow us to collect personal information from you, we may not be able to deliver certain products and services to you, and some of our services may not be able to take account of your interests and preferences.

Children's Privacy

We recognize the need to provide further privacy protections with respect to personal information we may collect from children (users under the age of 13) on our site and application. When we intend to collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices with regard to children, including the types of personal information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted

For additional information about our practices regarding children's personal information, please read our Children's Privacy Policy found on our website.

Data Security, Integrity and Retention

The security, integrity and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our

best efforts, no security measures are perfect or impenetrable. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

What Happens When There Are Changes to this Privacy Policy?

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Services. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

What If I Have Questions or Concerns?

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to bianca@stasherapp.com. We will make every effort to resolve your concerns.

Effective Date: January 17, 2015.