

# Moven Privacy Policy

**Date Last Revised: May 21, 2022**

At Moven, our most important asset is your trust.

Moven is committed to maintaining the confidentiality, integrity, and security of any sensitive information within our control. This Privacy Policy explains how we utilize and protect personal information provided through [moven.com](https://moven.com) ("Website") and any data required by our Client products including services, APIs, SDK modules, and mobile applications ("Products").

We regularly evaluate our privacy and security policies and adapt them as necessary to deal with new challenges and industry requirements. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting.

If you have questions, comments, concerns or feedback regarding this policy or any other privacy or security concern, please notify us via email to [security@moven.com](mailto:security@moven.com).

## Your Data

### Data We Collect from our Website

Moven only collects your personal information when voluntarily provided for further contact on the 'Contact Us' or 'Demo' pages. This information includes your name, email address, and phone number. Any information provided is stored securely, is only visible to authorized members of Moven's Sales Team, and is only used to contact you on your inquiry. We do not share or distribute personal information to any 3<sup>rd</sup> parties and this information can be permanently deleted upon request.

### Data We Collect for Products

Moven collects data from Clients and Partners, including Core Banking and Aggregation Services, during the normal course of service delivery. This includes user, account (i.e. names, types), and transaction (i.e. memos, dates, amounts) data. This data is anonymized using hashed identifiers and is stored securely.

Additionally, Moven collects certain Personally Identifiable Information ("PII") as a part of the user registration process. This may include items such as your address and phone number. Any information provided is stored securely, is only visible to authorized members of Moven's Operations Team, and is only used for identity verification. We do not share or distribute personal information to any 3<sup>rd</sup> parties and this information can be permanently deleted upon request.

For Clients to benefit from the full functionality of Moven Products, End-Users may be asked to provide access to account data at other financial institutions for presentation and use within the Product. The access utilizes multiple layers of security to ensure no unauthorized access to user, account, or transactional data.

## Online Session Information and Use is Collected to Improve Your Experience

We may collect technical and navigational information, such as browser type, IP address, pages visited, and average time spent on our Website. This information is used to improve the design, flow, and functionality of the Website or Product.

## We May Use 3<sup>rd</sup> Party Providers to Help Us Improve Our Service

We may utilize 3<sup>rd</sup> party service providers to help us analyze Website and promotional activity. For example, these service providers may help us measure the performance of our online campaigns or analyze the most frequently visited Website pages or Product screens. We may permit these service providers to use cookies and other technologies to perform these services. We do not share any personal information about you with these service providers, and these service providers do not collect such information on our behalf.

Any 3<sup>rd</sup> party service provider we engage is required to comply fully with this policy.

## Always Keep Your Personal Information Up to Date

It is your responsibility to keep your personal information up to date by updating your profile on [moven.com](#) or within the Product. Certain areas and features of our Website are available to you without registration or the need to provide any information. However, other features of the Website may only be accessible after registration.

## Your Privacy

### Your Privacy is Not for Sale

We take privacy seriously. We do not sell or rent your personal information to anyone, for any reason.

### You May Request Removal of Your Personal Information at Any Time

Moven respects your privacy concerns and will, upon your request, permanently delete your personal information from our records.

### Email Communications from Us

Moven may periodically send out promotional emails and/or newsletters. You have the option to opt-out of these communications by following the unsubscribe instructions in the email. For current Clients, opting out of promotional emails will not affect delivery of service-related emails from Moven.

Moven will not directly communicate with Client End-Users for any reason without prior approval.

### Disclosure of Your Information

Notwithstanding the foregoing, Moven reserves the right (and you authorize Moven) to share or disclose your personal information when Moven determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

1. To prevent prohibited or illegal activities; or
2. When required by any applicable law, regulation, subpoena, or other legal process.

# Your Security

## We Are Committed to Keeping Your Personal Information Secure

The security of your personal information is of paramount importance to Moven. To that end, Moven utilizes multiple physical, electronic, and procedural measures to protect against loss, misuse, and/or alteration of information under our control. Access to your personal information is strictly controlled, limited, and requires approval from Moven's Leadership Team.

## We Are Committed to Keeping Our Client and Partner Data Secure

Our Clients and Partners entrust Moven to maintain the security and integrity of all data provided during the normal course of service operation. We use a combination of firewalls, encryption, VPN, and authentication procedures to maintain end-to-end protection for data, from delivery to Moven through presentation to the End-User Product.

Hosting services, such as Cloud Providers, utilized by Moven Products are maintained in secure facilities that require multiple levels of authentication and approval to access. Security personnel are on-site and actively monitoring 24 hours a day, 7 days a week.

End-Users are responsible for keeping their login credentials and personal information confidential. Moven Products utilize modern authentication methods, such as OAuth 2.0, for granting access. As such, Moven does not store any End-User credentials and has no method for retrieving this data. Additionally, End-Users are responsible for controlling and limiting access to mobile devices that have a Moven Product installed. Moven is not responsible for any damages incurred due to the compromise of End-User credentials, personal information, or mobile devices.

## Our Services Secure Communications with Encryption

All communications internally between Moven services and infrastructure, as well as communications between Moven and Clients/Partners/End-Users, are encrypted. This is implemented in a manner that prevents unauthorized access, eavesdropping, tampering, and/or message forgery.

## Restrictions and Monitoring of Our Partners

Any partners we work with have been selected in accordance with our security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## Data Transfer Upon Change of Control or Sale of Assets, but Only in Accordance with this Policy

Personal information may be transferred to a 3<sup>rd</sup> party due to sale, acquisition, merger, reorganization, or other business event resulting in a change of management control. In this event, all personal information will continue to be handled in accordance with this policy at all times.