

Jangu Adlam's Privacy Policy

Jangu Adlam, Inc., a Delaware B-corporation, is serious about protecting your privacy. This Privacy Policy ("Policy") covers how Jangu Adlam collects and uses the personal information you provide on our application and website and in conjunction with any of the services hosted at www.JanguAdlam.com ("Service" and "Website"), including money transfer and payment services accessed by internet enabled devices. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information. This Policy also applies if you participate in our research projects. The Policy was last updated on March 26, 2023. This Policy explains what personal information we collect about you, with whom we share it, and how you can elect in certain situations to not share information with third parties. "Personal Information" refers to information such as name and email that can be used to identify you individually. We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on the Website. If, however, we plan to make a material change in the way we collect, use, or store your personal information, we will provide prior notice on our website, and by email. You will then have the chance to decide whether or not we will use or disclose your information in that new manner, whether through an "opt-out" procedure or by ending your relationship with us. Such changes will become effective, at the earliest, 30 days after the date of the email notifications. We ask that minors refrain from using our Service or submitting any personal information to us. Minors (those under the age of 18 years) are not eligible to use our Service. If you have questions or concerns regarding this Policy, you should [contact us](https://www.JanguAdlam.com/contact).

Information We Collect

We will collect the following information about you, which may include non-public personal information:

- 1.** Personal and financial Information you give us as a result of using the Service, such as your address, e-mail address, date of birth, telephone number, all or part of your Social Security number (or its equivalent in your jurisdiction), bank account online login information, bank account number, credit/debit card number and/or credentials to access any other sources of your funds. Under certain circumstances we will also collect and save information obtained from (i) copies of official identification documents, including your Passport or Drivers' License, and (ii) your picture, video/ audio recording, or other evidence of yourself with your identification documentation.
- 2.** Third party personal information you provide in order for us to facilitate funds transfers, such as your recipient's full name, physical address, email address, and phone number. However, we will not contact your recipients except as instructed by you or as required to complete a transaction. This information is only used for the sole purpose of completing your request or for whatever reason it may have been provided.
- 3.** Information about your usage of the Service, including your transaction history, and how and to whom you use the Service to pay, send or receive money;

4. Information that we lawfully obtain from third parties, such as identity verification services, electronic database services, and credit reporting agencies;

5. Information that we indirectly obtain from you, such as information about the hardware and software you use when accessing the Service, your IP address, and the pages you access on this website, and other websites that you visit prior to accessing the Service.

Technologies such as: cookies, beacons, tags and scripts are used by JanguAdlam, Inc. and our marketing, analytics and risk partners or affiliates. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We may use cookies for site functionality, remembering user's settings (e.g. source & destination country), and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies some features or areas of our site will be limited. As is true of most websites and mobile applications, we gather certain information automatically and store it in log files.

This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve the services we offer you.

We use Local Storage Objects (LSOs) such as HTML5 to store content information and preferences. Third parties with whom we partner to provide certain features on our site and mobile application or to display advertising based upon your browsing activity use LSOs such as HTML 5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs. We may partner with a third party to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by updating your cookies settings on any site you browse. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Why We Collect Information

We collect Personal and Non-Personal information for the following purposes:

1. To process your transactions.
2. To verify your identity.
3. To collect payment for your use of the Service.
4. To track, improve and personalize our Services, content and advertising
5. To troubleshoot problems with the Service.

6. To comply with applicable laws and regulations, such as those relating to "know-your-customer," and anti-money laundering requirements.
7. To detect and prevent fraud and other illegal uses of the Service.
8. To create an account connection between your JanguAdlam account and a third party account or platform (such as your online bank account);
9. To send you marketing notices, service updates, and promotional offers
10. To collect survey information that will be used to monitor or improve the use of our Service and overall customer satisfaction.

We will retain your information for as long as your account is active or as needed to provide you Service. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How We Share Information With Others

We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell or rent the information we collect to third parties for their promotional purposes. These companies are authorized to use your personally identifiable information only as necessary to provide these services to us.

Nevertheless, we may share information about you (including nonpublic, personal information) with:

1. Third-party service providers under contract with JanguAdlam that help us with our business operations, such as transaction processing, fraud prevention, marketing, market research, and validation of information provided. These third parties are prohibited from using your information for their own separate business purposes.
2. In the event of the sale, acquisition or merger of some or all of our assets, your personal information might be a part of the transferred assets. We shall notify you in the event of such an occurrence, as well as any choices you may have regarding your personal information, by placing a notice on our website.
3. Law enforcement, government officials or other third parties, but only
 - in connection with a formal request, subpoena, court order, or similar legal procedure; and,
 - when we believe in good faith that disclosure is necessary to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or to investigate violations of our User Agreement.
4. Other third parties that you consent or direct, which may include you authorizing an account linking for a third party service, account and/or platform.
 - For the purposes of this privacy policy, an "account linking" with such a third party is a connection you authorize or enable between your JanguAdlam account and a non-JanguAdlam account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, JanguAdlam and

the third-party will exchange your personal information and other information directly. Examples of account connections include: connecting your JanguAdlam account to a third-party data aggregation or financial services company, if you provide such company with your account log-in credentials;

- If you connect your JanguAdlam account to other banking or similar accounts, directly or through a third-party service provider, we may have access to your account balance and account and transactional information, such as purchases and funds transfers. If you choose to create an account linkage, we may receive information from the third-party about you and your use of the third-party's service. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this privacy policy.
- Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your personal information as part of the account connection.

Access To Your Information

You can access, modify, delete or update your personal information submitted on our application by logging into your account and changing your preferences, by emailing our Customer Support at hello@JanguAdlam.com. We will respond to your request to access within a reasonable timeframe.

Research Participants

Personal information we collect: If you participate in any research projects for us (by phone, in-person, electronic survey or otherwise), we will hold your name, contact details and any other personal information you choose to give us when taking part in our research projects. Using your personal information: We will use this information for our legitimate interests namely to conduct our research projects which may also help us to improve and/or develop our products and services. Sharing your personal information: We will share this information with:

- our staff (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- our platform, database, and application/website hosting suppliers to enable them to maintain, protect, support and host those solutions which are used to store our research;
- various third parties who provide software and tools which are used to operate our business (including email, instant messaging, document/contract management and file-sharing);

- third parties in the event of the sale, acquisition or merger of some or all of our assets if your personal information is part of the transferred assets (we shall notify you in the event of such an occurrence, as well as any choices you may have regarding your personal information, by placing a notice on our Site).

Retaining your personal information: We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, we consider (amongst other things):

- obligations and/or retention periods imposed on us by applicable laws and/or our regulators
- the amount, nature, and sensitivity of the personal information
- the potential risk of harm from unauthorized use or disclosure of your personal information, and
- the purposes for which we process your personal information and whether we can achieve those purposes through other means.

Notice to Customers who reside in California

The California Consumer Privacy Act (CCPA) exempts certain nonpublic personal information which is covered by the Gramm-Leach Bliley Act (GLBA), a federal privacy law that applies to financial institutions, like JanguAdlam. What this means is that your nonpublic personal information that you provide to us to obtain our Service, that results from any transaction you make using our Service, or that we otherwise obtain about you in connection with us providing our Service to you (GLBA Personal Information), is not subject to the various requirements set out in the CCPA. We do not collect nonpublic personal information about you that is outside a Transaction or the provision of our Services.

Please be assured that we take the privacy of your GLBA Personal Information very seriously. Your GLBA Personal Information is protected under the GLBA which places certain obligations on us, and affords you certain rights, all of which are set out in this Policy. The rights you have in the event that your non-encrypted or non-redacted GLBA Personal Information is subject to unauthorized access and exfiltration, theft, or disclosure as a result of our failure to implement and maintain reasonable and appropriate security procedures and practices remain.

Security

We employ industry accepted standards in protecting the information you submit to us on our Application and Website.

We have put in place SSL (Secure Socket Layer) encryption technology to protect your sensitive information that you share with us on our website. We also use a firewall

protected microservices based software architecture with encrypted access keys and databases, wherever possible, to protect sensitive information such as bank account number, credit card number, date of birth and Social Security Number, transmitted through our Application. To increase the security of your data we do not use passwords, we instead make use of a timed passcode that is sent to your registered phone number everytime you sign into our Application. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

If you have any questions about security on our application, you can contact us at [Customer Service](hello@JanguAdlam.com.com).

Choices You Can Make About Our Use Of Your Information

Federal and state laws allow you to restrict the sharing of your personal information in certain instances. However, these laws also state that you cannot restrict all types of sharing. Because we have chosen to refrain from certain types of data sharing, the only type of sharing of your personal information that you may restrict is as follows:

1. You may opt-out from promotional emails to you by selecting the "Unsubscribe" function present in each email we send you.

Links to 3rd Party Sites

Our Site includes links to other web sites whose privacy practices may differ from those of JanguAdlam, Inc. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any web site you visit.

Google Maps

Parts of the JanguAdlam Service uses Mapping service providers, including the Google Maps API(s). Use of these features is subject to Google Maps Additional Terms of Use and the Google Privacy Policy.

Chat

We may use a chat feature to answer questions about our service and assist you with our application's and/or website's functionality. If our chat feature is offline we will collect your name and email address so that we may reply to your request.

Social Media Widgets

Our application and website include Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site.

Your interactions with these Features are governed by the privacy policy of the company providing it.

Import Contacts

You can import contacts from your address book or mail provider to invite them to become members of JanguAdlam. We do not collect the username and password for the email account you wish to import your contacts from as you provide it directly to your provider and after your approval they send us the details of your contacts. At your instruction we will send an email or text message invite and at most two reminder emails or text messages in addition to the original invite. Each invite will have an “opt-out” or “unsubscribe” option.

Referrals

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name, phone number and/or email address. We will automatically send your friend an invitation by email or text message, to visit our site or download our application, and at most two reminder emails or text messages. JanguAdlam, Inc. stores this information for the sole purpose of sending these communications and tracking the success of your referral. Your friend may request that we remove this information from our database with the “opt-out” or “unsubscribe” feature embedded in every email or text message.

Complaints

If you have a complaint, contact JanguAdlam Customer Service by email at [Complaints](hello@JanguAdlam.com)

Contact

You can [contact us](https://www.JanguAdlam.com/home/contact) with any questions or concerns at: JanguAdlam, Inc., 3 West 123 Street, #6, New York NY 10027; Email: [Customer Service](hello@JanguAdlam.com.com)