

PRIVACY POLICY

This Privacy Policy (the “Policy”) explains how Neosave GmbH (“we,” “our,” “us”) collects, uses, discloses, and otherwise processes personal information in connection with our services, including our websites, mobile application or any other services, technology or products we may offer from time to time (collectively, “services”). Please read this Policy carefully.

Remember that your use of our services is at all times subject to our Terms of Use.

This Policy only applies to us and not to any third-party sites or services you may access through our website, our mobile application, or by using any of our services and does not apply to information submitted or collected by websites maintained by other companies or organizations to which we may link or who may link to us. We are not responsible for the actions and privacy policies of third-party websites or services rendered by such parties.

What is Personal Information?

When we use the term “personal information” in this Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. Personal information includes, without limitation, information we collect when you access or use the services to view, manage, or conduct transactions using your deposit or savings account from our partnering financial institution (“Bank”), which is made available by the Bank. However, this Policy does not apply to the financial products offered by the Bank itself. Please refer to the [terms and conditions](#) you enter into with the Bank and the Bank’s [Privacy & Security policy](#) for information concerning those products and your privacy rights with respect to those products.

Personal information does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to you. We collect, use, and share aggregated data such as statistical or demographic data for any purpose. For example, we may aggregate personal information and (a) use it for internal management purposes, (b) share it with current or prospective retailers and merchants, (c) use it to target offers that are made to users through our services, and (d) to calculate the percentage of users accessing a specific website feature. This type of information includes, for example, the types of product that a user purchases, the value of those purchases and the web, app, instore or other channels through which the purchases are made.

However, if we combine or connect aggregated data with other data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Policy.

Our Collection of Personal Information

From the first moment you interact with us, we are collecting personal information about you. Sometimes we collect personal information automatically when you interact with our services

and sometimes we collect the personal information directly from you. At times, we may collect personal information about you from other sources and third parties, even before our first direct interaction.

Personal Information You Provide

We collect the following personal information you provide in connection with our services:

- Identity Data, which includes, but is not limited to, first name, last name, username or similar identifier, title, date of birth, gender, tax identification or social security number or any other government issued identification number, and any form of identification that you provide to us so that we can verify your identity.
- Contact Data, which includes, but is not limited to, billing address, email address and telephone numbers.
- Financial Data, which includes, but is not limited to, bank account and payment card details.
- Transaction Data, which includes, but is not limited to, details about purchases you have made in connection with our services, payments we have made on your behalf, and cashback credits that may be due to you.
- Technical Data, which includes, but is not limited to, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data, which includes, but is not limited to, your username and password, your interests, preferences, feedback and survey responses.
- Usage Data, which includes, but is not limited to, information about how you use our website and services.
- Marketing and Communications Data, which includes, but is not limited to, your preferences in receiving marketing from us and our third parties and your communication preferences
- Other Information, which includes, but is not limited to, information you may provide, such as information you provide when you contact us with questions, feedback, survey responses, participation in contests, promotions or other prospective seller marketing forms or devices, suggestions for improvements of our services or products, referrals, or otherwise communicate with us, and/or personal information you affirmatively disclose to us in connection with your interactions with us, including through your use of our services.

Personal Information Automatically Collected

As is true of most digital platforms, we collect certain personal information automatically when you visit our online services, including, but not limited to:

- Technical Data and log file data, including your internet protocol (IP) address, operating system, browser type, browser id, date/time of visit, and pages visited, location data, including your general geographic location based on your IP address or more precise location when accessing our services through a mobile device and “Web Beacons” (also known as Web bugs, pixel tags or clear GIFs), which are tiny graphics with a unique identifier that may be included on our services for several purposes, including to deliver or communicate with cookies, to track and measure the performance of our services, to monitor how many visitors view our services, and

to monitor the effectiveness of our advertising. Unlike cookies, which are stored on the user's hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

- Usage Data.

- analytics data, including the electronic path you take to our services, through our services and when exiting our services, as well as your usage and activity on our services, such as the links and object you view, click or otherwise interact with (also known as “Clickstream Data”).

- information sent by your mobile device or web browser. We collect certain information that your mobile device sends when you use our services. For example, we may collect a device identifier, user settings and the operating system of your device, as well as information about your use of our services.

For information about our and our third-party partners' use of cookies and related technologies to collect information automatically, and any choices you may have in relation to its collection, please visit our Cookie Notice (below).

Personal Information from Other Sources and Third Parties

We also obtain personal information from other sources, which we often combine with personal information we collect either automatically or directly from you.

We receive certain categories of personal information (as described above) from the following sources and third parties:

- public databases and ID verification partners. We obtain information about you from public databases and ID verification partners to verify your identity and information you may provide us.

- third party sources. We also obtain information about you from third party sources. Such information may include credit report information, identity verification information, fraud detection information, collection information, and information about any person or corporation with whom you have had, currently have, or may have a financial relationship.

- data append services, data brokers, and joint marketing partners. We receive personal information from these sources so that we can better understand which of our services may be of interest to you.

- external bank account information providers. When you use certain services, we may collect from you, e.g., usernames, passwords, account numbers, and other account information for third-party websites and Internet banking services. This information is used to obtain your account, transaction, and other banking information from the relevant financial institution on your behalf.

- Financial institutions. We obtain information about you from your financial institution to provide our service.

We also receive: data from analytics providers such as Google; demographic data from advertising sources such as Facebook, Snapchat, Instagram, Twitter, and Google; data from

merchants who you make transactions with using our services or who otherwise permit you to enroll in any cashback or discount program offered by such merchants; data from affiliate advertising networks; data from technical monitoring and error reporting service providers; and contact and document information from identity verification providers.

Our Use of Personal Information

We may use your personal information to:

- to provide you with our services. to fulfill your requests for our products, programs, and services, to respond to your inquiries about our services, and to offer you other products, programs, or services that we believe may be of interest to you.
- to improve our services and run our services. We may use personal information to research, analyze, and understand how users access and use our services, both on an aggregated and individualized basis, in order to help us improve our services and develop new products. We also use personal information to operate, maintain, test, improve (including developing new products and services), enhance, update, monitor, diagnose, fix, and improve our services.
- to correspond with you. We use personal information to provide you with customer support anytime you reach out to us with questions or issues arising from your account. We also use personal information to send customers technical alerts, updates, security notifications, and administrative communications.
- personalize your experience. We might use tracking technologies like cookies.
- for marketing purposes. We may use your personal information to communicate with you regarding certain products, services or promotions offered by us or certain third-party products and services we believe you may be interested in, provided that you have not already opted out of receiving such communications.
- send you locally relevant options. We can only do this if you make your location available to us. If you do, this can help us enhance the security of our sites and services, and customize our services by sending your relevant coupons and otherwise personalizing content for you (e.g., through appropriate ads and search results).
- make it easy for you to find and connect with others.
- to detect, investigate, and prevent fraud and security issues. We use your personal information as necessary to protect us, our customers, and our business partners, including by investigating and preventing fraudulent activities, unauthorized access to the services, and other illegal activities.

- Verify information you have provided to us or to protect against fraudulent or illegal activities, including using information to validate your address through third party databases. comply with all applicable laws and regulations. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to comply with applicable anti-money laundering laws, to report to credit bureaus, and to respond to subpoenas or requests from the respective government authorities.
- enforce and carry out contracts and agreements between us and you.
- Assess each proposed transaction that you request through or in connection with services and to process approved transactions on your behalf, including processing merchant credits.
- Manage your account with the Bank.
- Manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy; and (b) asking you to leave a review or take a survey.
- Process, manage and investigate any claim or complaint raised by you regarding your account with us or Bank or merchant transactions, including the application of credits.

In addition, we may use your personal information described above (i) in connection with performing the contract we are about to enter into or have entered into with you; or (ii) when it is necessary for our legitimate interests (or those of a third party).

If you choose to contact us, we may need additional information to fulfill your request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Policy. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.

Our Disclosure of Personal Information

We may disclose your personal information in the following ways:

- Merchants: we may share your personal information with merchants in order to enroll in merchant offers, process your purchase, cashback credits and/or refunds and to access and purchase services or products from merchants through or in connection with the services.
- Service providers. We share your personal information with service providers that we have engaged to perform services on our behalf, including to third parties, in connection with the services we provide to you. This includes service providers that: conduct research and analytics; create content; provide customer, technical or operational support; conduct or support marketing (such as email or advertising platforms); host the services; maintain databases; send or support online or mobile advertising; allow you to conduct transactions in connection with the services;

and otherwise support or help us provide the services. Service providers also include payment processors, payment networks, external bank account information providers, providers of identity services, risk investigation and mitigation service providers, hosting, technology and communication providers, security and fraud prevention consultants, risk investigation and mitigation service providers, support and customer service vendors and product fulfillment and delivery providers. You acknowledge that such third parties will have access to your personal information on a need basis, in connection with the services rendered by us.

- Advertising and marketing partners. We share your personal information with other third parties, including advertising/analytics partners who enable the delivery of interest-based advertising to users, as well as vendors that provide specific services we do not.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy policy. We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.

- Legal Obligations and Rights. We may disclose personal information to third parties, such as legal advisors and law enforcement:

- o in connection with the establishment, exercise, or defense of legal claims;
 - o to comply with laws or to respond to lawful requests and legal process;
 - o to protect the rights and property of us, our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - o to detect, suppress, or prevent fraud;
 - o to reduce credit risk and collect debts owed to us
 - o to protect the health and safety of us, our customers, or any person; or as otherwise required by applicable law.

We use or may use the data collected through cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit our websites and online services; (b) provide and monitor the effectiveness of our websites and online services; (c) monitor online usage and activities of our websites and online services; (d) diagnose errors and problems with our websites and online services; (e) otherwise plan for and enhance our online services; and/or (f) facilitate the purposes identified in the Our Use of Personal Information section of this Policy. We and our advertising partners also use the information we collect through cookies to understand your browsing activities, including across unaffiliated third-party sites, so that we can deliver ads and information about products and services that may be of interest to you.

Please note that we link some of the personal information we collect through cookies with the other personal information that we collect about you and for the purposes described in this Policy.

Your Choices About Cookies

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our online services, as some features and services on our online services may not work properly. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

You can learn more about Google's practices with Google Analytics by visiting Google's privacy policy. You can also view Google's currently available opt-out options.

Children's Personal Information

Our websites and services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you are under the age of 13, please do not use our websites or online services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 13 has provided personal information to us, we encourage the child's parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 13, we will promptly delete that personal information.

Third-Party Websites

Our websites and online services may include links to third-party websites, plug-ins and applications. This Policy does not apply to, and we are not responsible for, any personal information practices of third-party websites and online services or the practices of other third parties. To learn about the personal information practices of third parties, please visit their respective privacy policies.

Protecting Your Information

While we take reasonable steps to protect your personal information, nothing on the internet is 100% secure. For these reasons, we cannot guarantee that all of your personal information will never be disclosed in ways you do not expect, or which are not described in this Policy. While

we protect our systems and services, we cannot guarantee the security of your information during transmission and any transmission is at your own risk. Also, you are responsible for keeping your password(s) and account information safe and private. You are also responsible for making sure your personal information is accurate and up-to-date.

Updates to This Policy

We will update this Policy from time to time. When we make changes to this Policy, we will change the "Last Updated" date at the beginning of this Policy. If we make material changes to this Policy, we will notify you or by e-mail to your registered email address, by prominent posting on this website or our online services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

Contact Us

If you have any questions or requests in connection with this Policy or other privacy-related matters, please send an email to contact@neosave.club.