



UNITED STATES PRIVACY POLICY

Effective Date: Rev. September 1, 2020

At Crystal, we take privacy and security seriously. This United States Privacy Policy outlines how Crystal, Inc and its affiliates (collectively, the “**Company**,” “**Crystal**,” “**we**,” “**our**,” or “**us**”) process the information we collect about you through our websites, mobile apps, and other online services (collectively, the “**Services**”) and when you otherwise interact with us, such as through our customer service channels.

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1. TYPES OF INFORMATION COLLECTED AND HOW WE COLLECT THEM

Personal Information You Provide:

We collect the following personal information you provide when you use our Services, like when you sign up for an account, request a transaction, enroll in a promotion or program, or otherwise engage or communicate with us:

- **Identity Data** includes your full name, date of birth, gender, social security numbers, and other data on government-issued identification documents.
- **Contact Data** includes your email address, mailing address, and telephone numbers.
- **Financial Data** includes your bank account and payment card details, suitability information, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores.
- **Profile Data** includes your username and password, purchases or orders made by you, your knowledge assessment results, and your interests, preferences, feedback, and survey responses.
- **Usage Information** includes information about how you access and use our Services, such as your actions on the Services, including your interactions with others on the Services, photos or

media you upload to the Services, your username, and other content you provide (“Usage Information”). We only access your device camera roll and camera with your permission. If you need to update your permissions, you can do so in your device’s settings. Please remember that Crystal may, but has no obligation to, monitor, record, and store Usage Information in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, to protect and defend our rights and property, or for other reasons relating to our provision of the Services. By using the Services, you consent to the recording, storage, and disclosure of such information you send or receive for these purposes.

- **Contact List Information.** With your permission, we may access your contact list on your mobile device or in your email accounts so that you can identify your contacts on the Services and direct the invitation of your contacts. We store and use this information to suggest referrals or connections and for other reasons related to our provision of the Services. We make these recommendations based on your contact list information as well as, with their consent, your contacts’ information if they are also a Crystal customer. We only access your contact list information with your explicit permission. If you provide us with personal data from your third-party contacts, it is your responsibility to ensure that the communication of such data to, and further processing by, Crystal is lawful. **For example, when you provide us with information about your contacts, we may use it to let you know which of your contacts have also signed up for our Services or, at your exclusive direction, send messages to your contacts regarding our Services. We will not send messages to your contacts that are not explicitly directed by you.**
- **Additional Information** includes information that you submit via focus groups, contests/sweepstakes, job applications, customer support, or other similar means. We may also collect any communications between Crystal and you (including recording calls made to or by Crystal) and any other information you provide to Crystal.

Personal Information Collected Automatically:

As is true of many digital platforms, we collect certain personal information automatically when you visit our online services, including:

- **Location Data.** To help us protect against fraud, provide our services to you, and improve our services, we collect location data, including current and historical information concerning a user’s geographic location, GPS location, transaction location, and IP addresses that they use in conjunction with our Services. We collect information about your location through GPS, Wi-Fi, wireless network triangulation, or other methods in order to obtain your location. We may also approximate your location by your IP Address. We also use the Google Maps API to gather information about your location. Google uses various technologies to determine your location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see [Google’s Privacy Policy](#) to learn more).
- **Usage and Device Data Collected Automatically Through Tracking Technologies.** To provide a personalized and enhanced user experience, we, and our third-party partners, automatically collect certain types of usage information when you visit or use our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons, embedded scripts, location identifying technologies, file information, and similar technology (collectively, “Tracking

Technologies”). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID (that allows us to uniquely identify your browser, mobile device, or your account), and other similar information. We use Tracking Technologies to help ensure that you have a high-quality experience on our Services. We also use Tracking Technologies to aid in the targeted advertising of our services on other platforms. From your device manufacturer, we also may collect the names of other third-party applications that you have downloaded on your device.

If you prefer, you can change your cookie settings. Some browsers have options that allow the user to control whether the browser will accept cookies, reject cookies, or notify the user each time a cookie is sent. You may elect to reject cookies by adjusting your settings but doing so will limit the range of features available to you on our Services and other websites. Be sure to read any information provided by your browser developer to understand the limitations of these settings, as they may differ from browser to browser and may not apply to all technologies. 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, used our Services, or performed certain functions with it.

Our Services also occasionally use “local shared objects” (also known as “Flash cookies”). Like browser cookies, Flash cookies may be used for coordinating content delivery, website functionality, maintaining preferences, advertising, or analytics. Unlike browser cookies, “Flash cookies” are not stored in the browser. You may be able to manage these Flash cookies by visiting the Adobe website [here](#).

Do-Not-Track Signals and Similar Mechanisms. Some web browsers transmit “do-not-track” signals to websites. We currently don’t take action in response to these signals.

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.

- **Third-party Data** includes data that we collect from business partners, marketing, and vendor partners.
- **Account Linking.** Crystal uses Plaid Inc. (“Plaid”) to gather your data from financial institutions. By using the Services, you grant Crystal and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid [End User Privacy Policy](#).
- **Third Party Services.** If you link, connect, or log in to your Crystal Account with a third-party service (e.g. Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Publicly Available Data** includes contact information, employment-related information, and other information from publicly available sources. We may combine this information with the information we collect from you directly. We use this information to contact you, to send you

advertising or promotional materials, to personalize our Services, and to better understand the demographics of our users.

2. HOW WE USE YOUR INFORMATION

We use and process the information we collect for purposes described in this United States Privacy Policy or as otherwise described to you on our Services or in connection with our Services. For example, we use your information to:

- **Create and process your account and deliver the Services to you**, including to allow you to register for the Services and participate in interactive features and for Crystal to authenticate your identity, handle account management, fulfill our legal and regulatory obligations such as obligations that apply to being a regulated broker-dealer, and complete other administrative matters;
- **Send you transactional information**, including confirmations, technical notices, product and services information and announcements, software updates, security alerts, support and administrative messages, and information about your transactions with us;
- **Communicate with you** such as to respond to your comments and questions, deliver newsletters or other content we believe you will be interested in, provide customer service or feedback, contact you about amounts owed, conduct surveys, respond to employment opportunities for which you've applied, notify you about upcoming events, or for any other purposes in connection with the Services;
- **Conduct research and analytics** to understand our visitors and customers and tailor our product offerings;
- **Provide you with updates about products and services** offered by us and selected partners, as well as facilitate new contests, sweepstakes, promotions, and rewards;
- **Make suggestions and recommendations** to you about things that are similar to those about which you have inquired or that may otherwise be of interest to you, such as providing you with advertisements based on your interests and activity on the Services;
- **Monitor, administer, and enhance our Services**, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;
- Enhance the safety and security of **our Services, business, and users**, and investigate or provide notice of fraud or unlawful or criminal activity;
- **Perform audits and protect or exercise our legal rights or defend against legal claims**, including to enforce and carry out contracts and agreements; and
- **Comply with applicable laws and legal obligations.**

3. DISCLOSURES OF PERSONAL INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect. We may share your personal information in the instances described below. For further information on your choices regarding your personal information, see the "Control Over Your Information" section below. We do not sell or rent your

personal information to third parties, aside from substantial corporate transactions (described below).

- Authorized third-party vendors and service providers. We share personal data with certain authorized and vetted contractors, subcontractors, third-party vendors, and service providers who help us run and protect our business. This includes sending emails, conducting business analytics, marketing, and data processing. For example, we may share personal data with service providers that identify and serve targeted advertisements or provide mailing services, tax and accounting services, contest fulfillment, web hosting, or analytics services.
- Legal purposes. We disclose personal data to respond to subpoenas, court orders, legal process, law-enforcement requests, legal claims, or government inquiries and to protect and defend the rights, interests, safety, and security of Crystal, our affiliates, users, or the public.
- With your consent. We share personal data for any other purposes disclosed to you with your consent.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

4. THIRD-PARTY LINKS

Some of the Services may contain links to content maintained by third parties that we don't control. We're not responsible for the privacy practices of these third parties or the content on the third-party services, and the information practices of these third parties are not covered by this Policy. Please note that these third-party services have their own privacy policies, and we strongly recommend that you read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

5. THIRD-PARTY TRACKING AND ONLINE ADVERTISING

We participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. As a self-directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our Services. We permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our Services over time so that they may play or display ads on other websites, apps, or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies. For advertising, we may share a common account identifier (such as an email address or user ID) or hashed data with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online on other platforms more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

We're not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Policy. Some of these companies are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please visit <http://www.networkadvertising.org/choices> or the DAA's resources, available at www.aboutads.info/choices. You may also be able to set your browser to

delete or notify you of cookies by actively managing the settings on your browser or mobile device. Please note that some advertising opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies, you may need to perform the opt-out task again. You may also be able to limit certain interest-based mobile advertising through the settings on your mobile device by selecting “limit ad tracking” (iOS) or “opt out of interest based ads” (Android).

Google Analytics and Advertising. We use Google Analytics to recognize you and link your devices and when you use our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, see “How Google uses data when you use our partners’ sites or apps” linked here: www.google.com/policies/privacy/partners/. You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Ad-On, here: <https://tools.google.com/dlpage/gaoptout/>. We may also use certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features let us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your use of our Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI’s online resources at <http://www.networkadvertising.org/choices>.

6. CONTROL OVER YOUR INFORMATION

Account profile. You may update certain of your account profile information by logging into your account.

Access to your device data. You may control the mobile app’s access to your device information in your device’s settings. For instance, you can withdraw permission for the app to access your contact list or photo gallery.

How to control your communications preferences. You can stop receiving promotional emails from us by clicking on the provided “unsubscribe” link. You may not opt out of service-related or other non-promotional communications (e.g., account verification, transactional communications, changes/updates to features of the Services, and technical and security notices).

Affiliate Sharing Opt Out. In some cases, you can limit sharing between Crystal affiliates. If you want to exercise this right, please contact at support@crystalspend.com.

7. NOTICE TO CALIFORNIA RESIDENTS

This section provides additional details about the personal information we collect about California residents and the rights afforded to them under the California Consumer Privacy Act (“CCPA”). Please note that the CCPA does not apply to what is referred to as nonpublic personal information collected by financial institutions (like Crystal), as that information is subject instead to other

financial privacy laws. As a result, the CCPA does not apply to most of the information that Crystal collects.

Subject to certain limitations and exceptions, the CCPA provides California residents the right to request more details about the categories and specific elements of personal information we collect, to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. We do not sell information about you to third parties. In order to help Crystal deliver advertising and marketing on other platforms, we do allow third parties to collect information through our Services. Please see the [“Third-Party Tracking and Online Advertising”](#) section above for more details, including choices available to you.

In the last 12 months, we collected the following categories of personal information subject to the CCPA: identifiers (such as email address and IP address), approximate geolocation information, and Internet or other electronic network activity information (such as browsing history and related usage data). For more details about the information we collect and the categories of sources of this information, please see the [“TYPES OF INFORMATION COLLECTED AND HOW WE COLLECT THEM”](#) section above. We share this information with the categories of third parties described in the [“DISCLOSURES OF PERSONAL INFORMATION”](#) section above.

California residents may make a consumer rights request for access to certain personal information subject to the CCPA, not otherwise exempted as nonpublic personal information collected by financial institutions, by sending an email to support@crystalspend.com. We may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

8. CHANGES TO THIS POLICY

This United States Privacy Policy will evolve with time, and when we update it, we will revise the "Effective Date" above and post the new Policy. To stay informed of our privacy practices, we recommend you review the Policy on a regular basis as you continue to use our Services.

9. HOW TO CONTACT US

If you have any questions about this United States Privacy Policy or the Services, please contact us at support@crystalspend.com.