# ONLINE PRIVACY STATEMENT (FORMERLY THE TECHNOLOGY PRIVACY STATEMENT)

# PLEASE READ THIS ONLINE PRIVACY STATEMENT CAREFULLY BEFORE ACCESSING OR USING OUR WEBSITES OR MOBILE APPLICATIONS.

Effective and Last Updated: March 2024

Your privacy is important to us. This Online Privacy Statement ("**Privacy Statement**") describes the types of information collected online or offline, used, and shared by Green Dot Corporation, Green Dot Bank d/b/a GoBank and GO2bank, and their subsidiaries and affiliated companies (collectively, "**Green Dot**," "**we,**" "**us,**" and "**our**") when you visit our websites, including our social media pages that we control; use our mobile applications; or interact with us.

Residents of certain jurisdictions may have certain rights related to their personal information. Please see the "Privacy Disclosures for Specific Jurisdictions" section below.

For information on how we collect, store, share, and otherwise use your personal information that is obtained in connection with your application for or use of our financial products or services, please see the privacy policy which governs your use of our specific products and services, which can be accessed by logging in to your online account. In the event of any conflict between this Privacy Statement and a privacy policy associated with a product or service you apply for or use, the privacy policy associated with the product or service will control.

We may change this Privacy Statement from time to time. If we do, we will notify you by posting the updated version.

## **INFORMATION COLLECTION (NOTICE OF COLLECTION)**

#### Information You Provide

We collect personal information from you when you choose to share it with us. This may include when you access or use our websites or mobile applications, request information from us, sign up for our newsletters or our email lists, participate in a promotion, or otherwise contact us. The personal information we collect may include your name, address, email address, and phone number.

# Information Automatically Collected

We may use cookies, web beacons, pixel tags, log files, local shared objects, and other technologies as follows: (1) for security and authentication purposes, (2) to collect certain information when you visit and use our websites or mobile applications, (3) to deliver online advertisements that we think would be more relevant to your interests, (4) to monitor interactions with our emails, online advertisements, and text and push messages, and (5) to allow us to keep track of analytics and certain statistical information that enable us to improve our websites, mobile applications, products, and services.

For example, we may automatically collect certain information from you, including, but not limited to, your browser type and version, device type, operating system and version, Internet Protocol ("IP") address, unique device identifier of your computer(s) or device(s) that are used to access our websites or mobile applications, software version, and the domain name from which you accessed our websites or mobile applications. We may also collect information about your

browsing and use behavior, such as the date and time you visit our websites or use our mobile applications, the areas or pages of the websites or mobile applications that you visit, the amount of time you spend viewing or using the websites or mobile applications, the number of times you return to the websites or mobile applications, other click-stream or website or mobile application usage data, emails that you open, forward, or click-through to our websites, other websites that you may visit, and your activity on our websites and mobile applications.

If you use certain features of our websites or mobile applications that involve location-based services (such as an ATM locator), we may also collect location information in order to: (1) provide you with the services or products that you request, including access to location-based information, and (2) monitor for fraud or other suspicious activity. The ways in which we collect location information, and the type of location information we collect, depend on the devices you use to access our websites or mobile applications and the settings for those devices. You may also manually enter a location (such as address, city, and postal code) to use the location-based services of our websites and mobile applications.

You can stop sharing location information with us at any time through your device or web browser settings or by deleting the mobile application from your device. If you stop sharing your location, certain features of our websites and mobile applications may not function properly or at all. If you have specific questions about the privacy settings of your device or web browser, we suggest you contact the manufacturer of your device, your mobile service provider, or web browser provider for help.

#### Information Received from Other Sources

We may collect personal information from you from other sources, including, for example, our affiliates, business partners, service providers, online social media networks, and other third parties, or from publicly available sources. The personal information we collect may include your name, physical address, and email address.

We also collect your information via third-party social networks when you use them to connect with us (for example, by posting comments on our posts or sending messages to us). If you choose to connect with us on third-party social networks, we may have access to certain information about you from that social network, such as your profile name, profile picture, networks, username and user ID, and comments, questions, and other posted content based on your privacy settings on that social network.

# • Tracking, California Do Not Track Disclosures, and Ad Choices

Certain parts of our websites require cookies. You are free to set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features of our websites or take full advantage of all our offerings. Please refer to your browser's or operating system's website or "Help" section for more information on how to delete cookies and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. Our system may not respond to Do Not Track requests or headers from some or all browsers.

We use certain analytics services, such as Google Analytics, that use cookies and similar technologies to collect and analyze information about use of our websites and mobile applications and report on activities and trends. These analytics services may also collect information

regarding the use of other websites, mobile apps, and online resources. You can learn about Google's practices at <a href="https://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>.

We and our network advertisers may periodically show you online ads for products and services you might be interested based on your visits to both our websites and other websites (a process known as "behavioral advertising"). In order to do this, we may allow third parties to place technology on our websites (e.g., a cookie or a pixel) that allows them to track you. The third party might also collect data over time and across other websites. They use this data to serve advertisements tailored to your interests, which may include advertisements about our products or services.

#### INFORMATION USE

We may use the information we collect from and about you for any of the following purposes:

- To protect and secure our websites, mobile applications, products, services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal;
- To notify you of incomplete applications or registrations;
- To respond to your inquiries or otherwise contact and communicate with you;
- To provide you and other users with customized content, targeted offers, and advertising on our websites and mobile applications, on third-party websites and applications, and via email:
- To contact you with information, newsletters, and promotional materials;
- To contact you when necessary;
- To review the usage and operations of our websites and mobile applications and improve our content, products, and services;
- To address problems with our websites, mobile applications, and our business;
- To manage our networks;
- To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements; and
- As described to you at the point of collection.

Additionally, if you use our websites or mobile applications to connect with third-party services, you authorize us to use information from and about you, on your behalf, to interact with these third-party services based on your requests.

To the extent we maintain and use personal information in a deidentified form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification processes satisfy our legal obligations.

#### INFORMATION DISCLOSURE

We may disclose the information we collect from and about you as follows: (1) with Green Dot subsidiaries and affiliated companies; (2) to our service providers that provide business, professional, or technical support functions for us; (3) as necessary if we believe that there has

been a violation of the Site Terms of Use or of our rights or the rights of any third party; (4) to respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; (5) with partner companies that assist us in advertising our products and services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising; (6) to social media platforms you use to interact with us, regarding your interactions with us; and (7) when you have consented or directed us to do so.

We may share aggregate or anonymous non-personal information with third parties. Also, we may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties.

#### OPTION TO OPT-OUT OF EMAIL MARKETING

At all times, you have the option of "opting out" of receiving future email marketing messages from Green Dot by clicking on the "unsubscribe" link at the bottom of an email marketing message.

## PROMOTIONAL TEXT MESSAGES

If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying "Reply STOP."

## **LINKS TO OTHER WEBSITES**

Our websites and mobile applications may have links to third-party websites and applications, which may have privacy policies that differ from our own. The inclusion of such links on our websites and mobile applications does not imply endorsement of the linked websites or applications by us, and we are not responsible for the practices of such websites or applications.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any personal information you disclose to other organizations through or in connection with our mobile applications or any social media pages.

### CHILDREN'S PRIVACY

Protecting children's privacy is important to us. In general, we do not direct our websites, mobile applications, products, or services to, nor do we knowingly collect any personal information from, children under the age of 13.

#### **DATA SECURITY**

We have taken reasonable physical, administrative, and technical steps to safeguard the information we collect from and about our customers. While we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures. In the event that we are required by law to inform you of a breach to your personal

information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

#### **ACCESS TO YOUR PERSONAL INFORMATION**

If our websites, mobile applications, products, or services allow you to create an account, you may sign in to your account to update your personal information stored by us.

#### **DATA RETENTION**

We may store information about you for as long as we have a legitimate business need for it. We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

#### **CONTACT US**

If you have any questions about this Privacy Statement or the practices described herein, or if you need to access this Privacy Statement in an alternative format due to having a disability, please contact us at the appropriate address below.

Mail: Green Dot Customer Service, P.O. Box 1070, Westchester, Ohio 45071-1070.

## **REVISIONS TO THIS STATEMENT**

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Statement at any time. When we do, we will post the change(s) on our websites and mobile applications.

#### PRIVACY DISCLOSURES FOR CALIFORNIA RESIDENTS

Pursuant to the California Consumer Privacy Act of 2018 ("*CCPA*"), we are providing the following additional details about our privacy practices. Please note that Green Dot is a financial institution subject to the Gramm-Leach-Bliley Act (*GLBA*) and that personal information collected about you for purposes related to Green Dot's financial products and services is subject to the GLBA and is not covered under the CCPA. For information on how we collect, store, share, and otherwise use your personal information that is obtained in connection with your application for or use of our financial products or services, please see the privacy policy associated with that product or service.

#### Collection and Disclosure of Personal Information

The following chart details which categories of personal information we may collect, as well as the categories of personal information we collect, the categories of third parties to whom personal information is disclosed for a business purpose, and the categories of third parties to whom personal information is "shared" (as the term is defined by the CCPA) in the preceding 12 months. We have not "sold" personal information within the preceding 12 months for monetary value. Please note, and as indicated below, we have shared personal information with advertising networks for the purpose of cross-context behavioral advertising. In addition to the recipients

identified below, we may have disclosed personal information to legal authorities to respond to requests or to protect and defend legal rights. We collect this personal information for the purposes described above in the "Information Use" Section.

Category of Personal Information	Categories of 3 <sup>rd</sup> Parties to Whom Personal Information is Disclosed for Business Purposes	Categories of 3 <sup>rd</sup> Parties to Whom Personal Information is Shared
Identifiers – this may include name, email address, postal address, telephone number, social media handles, or other similar identifiers.	<ul> <li>Our subsidiaries and affiliated companies</li> <li>Data analytics providers</li> <li>Business partners</li> <li>Internet service providers</li> <li>Marketing partners</li> <li>Operating systems and platforms</li> <li>Social networks</li> <li>Other service providers</li> </ul>	Advertising networks
Internet or electronic network activity information – this may include browsing history, search history, and information regarding an individual's interactions with our website, mobile application, or advertisements.	<ul> <li>Our subsidiaries and affiliated companies</li> <li>Data analytics providers</li> <li>Marketing partners</li> <li>Operating systems and platforms</li> <li>Social networks</li> <li>Other service providers</li> </ul>	Advertising networks
Geolocation data – including coarse and precise location data.	<ul><li>Our subsidiaries and affiliated companies</li><li>Other service providers</li></ul>	Not shared
Audio, electronic, visual, similar information, such as call recordings.	<ul><li>Our subsidiaries and affiliated companies</li><li>Other service providers</li></ul>	Not shared
Inferences drawn about you from any of the information listed above.	<ul> <li>Our subsidiaries and affiliated companies</li> <li>Data analytics providers</li> <li>Marketing partners</li> <li>Social networks</li> <li>Other service providers</li> </ul>	Advertising networks

California Sensitive Personal Information Disclosure. We collect the following category of sensitive personal information (as defined under California law): Precise geolocation. This information is collected in order to provide you with our website and mobile app store and ATM locator services. Note that we do not use such information for any purposes that are not identified within the California Privacy Rights Act Section 1798.121. We do not "sell" or "share" sensitive personal information for purposes of cross-context behavioral advertising.

# CCPA Rights and Requests

As a California resident, you have the rights listed below. However, these rights are not absolute and in certain cases we may deny your requests as permitted by law. For example, we may deny your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may deny your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer or where the personal information that we maintain about you is not subject to the CCPA. You have the right to be free from unlawful discrimination or retaliation for exercising your rights under the CCPA.

If you are a California resident, you (or your authorized agent) may make the following requests:

# (1) Request to Know (Access)

You may request that we disclose to you the following information covering the 12 months preceding your request and as far back as January 1, 2022:

- The categories of personal information we collected about you;
- The specific pieces of personal information we collected about you.

# (2) Request to Delete

You may request that we delete personal information we collected from you. Once your personal information is deleted, we won't be able to get it back for you. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for other business purposes.

#### (3) Request to Correct

You may request that we correct personal information about you that is no longer accurate or that is incorrect.

Please note that while a CCPA request to correct may be denied if your personal information is subject to GLBA and is not covered by CCPA, there are other methods in place that allow you to correct or update your personal account information. To update your email address, phone number and mailing address, you can login to your account via web or mobile app and select the "Personal Info" tab and follow the prompts therein. For updates to social security number, date of birth, legal name changes or misspelling requests or for any information on changes to personal information, please refer to the telephone number on the back of your card.

# (4) Opt-Out of Sharing Personal Information for Cross-Context Behavioral Advertising

Green Dot may share your personal information with advertising partners for the purpose of delivering interest-based online advertisements to you. You can opt-out of the sharing of your personal information for this purpose by visiting the "Your Privacy Choices" link in the footer of the Green Dot website and completing the fields therein. You may also opt-out of other forms of targeted advertising by submitting a request as described below. Please note that Green Dot does not sell personal information for monetary value to third parties.

Additionally, if you have enabled a recognized opt-out mechanism on your browser, device or platform, you will automatically be opted out of any "sharing" of personal information when you interact with our website. Please visit the <u>Global Privacy Control</u> website to learn more about this setting and how to enable it on your browser.

You can also opt out of certain targeted advertising by adjusting the privacy settings on your mobile device (e.g., "Limit Ad Tracking" on iOS or "Opt out of Ads Personalization" on Android).

Please note that your cookie-based preferences will apply only to the specific browser from which you opt out. You will need to opt out separately on all of your browsers. If you delete cookies, change web browsers, reset your mobile advertising ID, or use a different device, you may need to opt out again. Our online services do not function differently in response to browser "Do Not Track" signals, but you may opt out of certain targeted advertising as described above.

# **Submitting CCPA Requests**

To exercise the CCPA rights described above, you may submit a request by clicking <a href="here">here</a> or calling us at 833-937-0515. In an effort to protect your personal information from unauthorized access, deletion or correction and/or to prevent fraud or theft of your personal information and any of your assets, we will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal information subject to the request. Upon receiving a request, we will attempt to verify your identity by comparing the identifying information you provide with your request (e.g., your name and mailing address) to the personal information already maintained in our records. We may need to request additional personal information from you, such as your email address or telephone number, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your personal information. If you make a request to delete or correct, we may ask you to confirm your request before we delete or correct your personal information.

If we are subsequently unable to confirm your identity, we may refuse your rights request. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

## **Authorized Agents**

If you want to make a request as an authorized agent on behalf of a California resident, you may make a Request to Know, Request to Delete, or Request to Correct by clicking <u>here</u> or calling us at 833-937-0515. As part of our verification process, we may request that you provide:

- A power of attorney from the California resident pursuant to Probate Code sections 4121-4130; or
- A completed Authorized Agent Designation Form signed by the California resident that you are submitting a request on behalf. Green Dot will provide you with a copy of this form for completion after you have submitted the request.

If the authorized agent does not provide documentation showing that the authorized agent has power of attorney to act on the resident's behalf, then the resident will also be required to

independently verify their own identity directly with us and directly confirm that the resident provided the authorized agent permission to submit the rights request on their behalf.

# California – Employees of Businesses

California residents that are employees of businesses that have a business relationship with Green Dot have all of the rights described in the "Rights and Requests" bullet of the "Privacy Disclosures for California Residents" Section above, and employees of businesses may submit requests as described above. We may collect personal information about the employees of other businesses in the ordinary course of the business relationship between Green Dot and their employer, such as the employee's name and work email address. Examples of business relationships include, but are not limited to, vendors, service providers, contractors, partners, clients and consultants of Green Dot.

Green Dot collects and uses personal information of business employees for operational purposes in performing or receiving services pursuant to the nature of the business relationship between Green Dot and your employer. While we may disclose personal information of business employees for business purposes, we do not sell or share personal information of business employees.

# California – Employees of Green Dot

This privacy policy is not intended to apply to our employees. If you are a California employee of Green Dot, you may find our Employee CCPA Privacy Statement on the bottom of the home page of <a href="https://www.greendot.com">www.greendot.com</a> or on Green Dot's intranet.