

Privacy Policy

Effective as of: January 10, 2025

We value your trust and respect your privacy. We exist to support small business owners like you by offering a fast and easy way for you to manage your business finances.

We believe the only good policy is one you can understand without a lawyer by your side, so we've worked hard to explain—clearly and in plain English—what we do, what information we collect, and why, so you can feel confident about using Wave.

If anything here is unclear, please reach out to us. We sincerely hope this helps you better understand our privacy practices, and how we operate. Thank you for joining the Wave community!

A. SCOPE

Protecting your personal information is important to us. The following guidelines set forth our general privacy practices and principles that apply to information we collect. Our products and services are offered by Wave Financial Inc. or by companies related by common ownership or control, including Wave Financial USA Inc. and Wave Money Inc. (collectively, “Wave,” “we,” “us,” or “our”).

This privacy policy applies to:

- our products and services offered under the Wave brand;
- our websites and the products and services offered through those websites (including www.waveapps.com and its subdomains (the “Site”); and
- our mobile applications that incorporate this privacy policy.

If you have questions or complaints regarding our privacy practices or principles, please contact privacy@waveapps.com.

IN SIMPLE TERMS

Policies like these aren't always the easiest to understand (or fun to read). We'll do our best to make the legal language make sense on this side. The stuff along the left is what you're agreeing to.

Third Parties

This privacy policy does not apply to products or services offered by third parties on or through our Site or services or products or services offered by third-party websites, each of which have their own terms and conditions and privacy policies. You should carefully read each third party's privacy policies and any terms and conditions applicable to the product or service you request. When you request products or services from such third parties, you give us permission to provide them with information about you necessary to fulfill or process your request.

Your use of social media features may use scripting or may require us to share your IP address and which page you are visiting to enable the feature to function properly. Social media features and widgets are either hosted by a business partner or hosted directly on our site, and your interactions with these features are governed by the privacy notice of the company providing it. Examples of these features are the Facebook "Like" button, the "Share This" button, and interactive mini programs that run on our services.

Parent Company

This privacy policy does not apply to the products and services offered under the H&R Block brand or offered by another affiliate of our ultimate parent company, H&R Block, Inc., each of which have their own terms and conditions and privacy policies.

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Sometimes, we work with other companies and organizations to bring our customers an unbeatable experience. When this happens, their privacy policies apply and they'll have access to some of your information, but only as much as is absolutely necessary to provide the service you want.

Special Note to Parents

Because of the nature of the services we provide, we do not market our services to children under the age of 13, nor do we knowingly collect information from children under the age of 13.

What Is Personal Information?

As part of providing products and services to you, we may collect information, including personal information, about you and your business when you use our services. "Personal Information" is data that can be used to identify a person individually. That's what this policy is about – our collection, protection, use, retention, disclosure and other processing of Personal Information and your rights relating to these activities.

Categories of Personal Information Collected

The information we may collect includes, but is not limited to:

- Contact Information (e.g., name, phone number, address, and email address);
- Social Insurance Number or Social Security Number, and other government identification numbers (e.g., Employer Identification Number or Driver's License Number);
- Date of Birth;
- Financial Information (e.g., income, revenue, assets, credits, deductions, expenses, and bank account information);
- Payment Data (e.g., checking, debit and credit card account numbers, balances and payment history);
- Health Information (e.g., health insurance status and financial information related to payment for healthcare services);
- Geo-Location Information;
- Website, Mobile Application, and Email Usage Data (e.g., interactions with a website, application or advertisement);
- Device Information (e.g., internet protocol (IP) address, device type, unique identifier, app version, operating system, network data, and phone state);
- Login Information;
- Demographic Information;
- Professional or employment-related information; and
- Education information.

IN SIMPLE TERMS

We treat your personal information with the same respect we want our own to be treated with—and when you deal with finances like we do, there's a lot of personal information involved. Here's a list of exactly what we collect.

Aggregate Data

We also compile certain aggregate or anonymized data about our users. What is aggregate data? “Tim Smith buys a coffee at a coffee shop on Main Street” is the Personal Information of Tim Smith, but “20% of Wave users buy coffee on Tuesdays” is aggregate data. We may use and disclose aggregated or anonymized information in our public statements and to identify individuals that may be interested in our Services.

IN SIMPLE TERMS

Understanding our customers is a huge part of building better experiences. To do this, we may look at and share customer data in summarized and anonymous

forms, but rest assured, when we do, we cannot identify you or any customer personally.

Privacy Principles

Our privacy policy is based on the following ten fair information principles:

- Accountability
- Identifying purposes
- Consent
- Limiting collection
- Limiting use, disclosure, and retention
- Accuracy
- Safeguards
- Openness
- Individual access
- Challenging compliance

IN SIMPLE TERMS

The Canadian government provides these 10 principles on collecting, storing, and using Personal Information. By following this list, we cover all our bases so you can rest easy knowing your Personal Information is safe.

1. Accountability and Challenging Compliance

Wave has named a Privacy Officer who is responsible for all things privacy at Wave. This includes our policies and procedures that are designed to keep your Personal Information safe.

If you have any questions or concerns about our privacy practices or this privacy policy, you can contact us at:

- privacy@waveapps.com
- Privacy Officer
Wave Financial Inc.
155 Queens Quay E, Box 3,
Toronto, ON, M5A 0W4

If you're not satisfied with our response, you have the option of contacting the [Office of the Privacy Commissioner of Canada](#).

IN SIMPLE TERMS

If you have any questions or concerns about your privacy, we have someone to listen and help. Here's how you can get in touch with that person.

2. Identifying Purposes

Wave collects, uses, discloses, and otherwise manages Personal Information in a variety of ways related to our Site and the services we provide. We've outlined these below. Your use of the services determines which categories of Personal Information we collect and use. For example, payroll information is optional, unless you'd like to use Wave Payroll to run payrolls, at which point we will need to collect payroll information to provide you with this service. Similarly, when you create an invoice, your customer's email is optional, but if you'd like us to deliver the invoice by email, this information becomes necessary.

IN SIMPLE TERMS

Many Wave services and features simply wouldn't work without some Personal Information. Here's why and how that information is collected, stored, and used.

Purposes for which we Collect, Use or Store Personal Information

Wave may collect, use, or store Personal Information for the purposes described below. You provide most of the Personal Information we collect. We also receive information through certain digital technologies when you interact with us. Finally, other companies may share information with us.

We collect information directly from you.

- In order to provide you with the services you request, which may include the following:
 - We collect Personal Information directly from you when you use or interact with our Site or our services. This Personal Information may relate to you, your customers, your employees, or other individuals with whom you interact. This includes the Personal Information you provide as a part of setting up an online account, authenticating your identity, applying for or purchasing a product or service, or applying for employment. It also includes information from documents you choose to upload to your Wave account. If you choose not to provide certain information we request, we may be unable to serve you as our products or services may rely upon this information.
 - We may also collect Personal Information from third parties when you connect your Wave account to them. These integrations may pull data into or share data out of Wave. In some cases, we use a service provider to connect you to a third-party service (e.g., when you connect a bank account to Wave). When you connect your Wave

account with a third-party service, their terms and policies apply.

- We may also collect your name and email address from third parties when you sign up and login to our Site using single sign-on.

IN SIMPLE TERMS

We sometimes connect with other service providers to deliver the best products and services. When this happens, your information also falls under their terms and policies.

- Our Site or services may offer publicly accessible blogs or community forums. You should be aware that any Personal Information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Information from our blog or community forum, you may contact us at privacy@waveapps.com. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.
- To promote or offer you services, and to determine your eligibility for new products services we may offer from time to time.
- To offer you products and services from our business partners.
- To provide you with educational materials and guides relevant to the services you use.
- To contact you for the purposes of service updates and system and account notifications.
- To provide you with support in connection with the services.

We collect information when you use our services.

- We collect information and usage data whenever you interact with us, whether online, through a mobile application, or through an email. This data may include which websites you visit, what you click on, and when you performed those actions. These activities may be performed by us or a service provider acting on our behalf.

- We use certain web and wireless technologies to collect this information. These technologies include cookies and web beacons. Please see Section B.7 for an in-depth discussion of these technologies and how to opt out.

We collect information from other companies and government entities.

- In accordance with their privacy notices, our business partners and unrelated third parties (including the IRS or CRA and credit reporting agencies) may share certain information about you with us.
- We also collect information when you request services or information from us or companies with whom we have a business relationship, enter contests or sweepstakes, or complete surveys or polls.
- To improve the security of our services, to protect your identity, and to protect your information, we may verify your personal information by matching the information you provide against other publicly available information that we obtain from identification verification companies.

IN SIMPLE TERMS

Personal Information would only appear in our blog or community if you posted it. If you've posted on our site and want it removed, just let us know. We can almost always remove it, and if not, we'll let you know why.

How Do We Use Your Information?

We use your information to provide you with the products and services you request. We may also use your information, as permitted by law, including to service and report on your account; offer you relevant information, products, or services; and enhance our products and services. These activities may be performed by us or a service provider acting on our behalf.

- **Offer you products and services.** We may use your information to contact you about products and services offered by us or another Wave company. Wave companies are those related to us by common ownership or control. This may include the delivery of newsletters or publications. We may also use aggregate information to offer our products and services.
- **Geo-Location Uses.** We may use your location to provide you with a list of nearby ATMs, assess the level of interest in our services in a particular area, and enhance the services we are providing you and other customers. You may at any time revoke our collection of this information by turning this off

at the device level and not using our ATM locator.

- **Mobile Devices.** Subject to your control, our mobile services may request permission to dial a phone number, access your camera or photo library, access the internet, access your calendar, send you push notifications, wake/lock your mobile device, or authorize in-app purchases.
- **Wave Account.** We may use your information to set up an online account or authenticate your identity when you request certain services from us. We may use your email address as your online username. When you add documents to your Wave account, Wave might access them to assist you with bookkeeping, coaching, or enhancing its services. We may retain your Wave documents as allowed or required by law.
- **Security Enhancements.** We may use your information to improve the security of our services, protect your identity, and protect your information.
- **Unique Identifiers.** We may assign you a unique identifier when you use our services. This unique identifier allows us to match information collected through our other various products and services. Generally, we use this information to help us better understand your use of our products and services and to customize your experience and better serve you.
- **Calculators and Tools.** When you use our calculators and other tools, we may collect non-identifiable data, such as the number of people that use a certain tool. We may also set cookies or clear gifs based upon your use, so you do not have to re-enter your information in a later visit and to help us customize offers and tools to your particular interests. For our calculators and other tools that require registration or ask for your contact information, we may contact you directly with relevant services and offers.
- **Referral Program.** If you choose to participate in our referral service, we may ask for that person's name and contact information, including email address. We will send them a single invitation email to the address you provide. Please ensure that you only submit email addresses of individuals or businesses with whom you have a relationship and who would want to receive the message. We do not store or use this information except as part of our referral program. The person may contact us at privacy@waveapps.com to request that we remove their information from our systems. If you are a California resident, please see Section B.3 -

California Notice of Financial Incentive.

- **Automated Decision Making.** We may use automated decision making with respect to your Personal Information for risk-related measures and to help protect your account and Wave from fraud.

We do not sell or share your Personal Information with other companies.

IN SIMPLE TERMS

We will not sell your details, ever.

How We Disclose Information.

We may disclose your Personal Information among the Wave companies, to our other affiliates, and to third parties with whom we have a written contract limiting the use and disclosure of your Personal Information (“service providers”), as directed by you to provide the services or products you request or as permitted by law. We may share your Personal Information to support the products and services you request or provide you with information on products and services that may benefit you.

IN SIMPLE TERMS

There are times when personal information does need to be disclosed. You have the right to know about these situations, so we’ve listed them here.

For example:

- **Wave Companies and Our Other Affiliates, including H&R Block.** We may provide Personal Information to companies related to us by common ownership or control. These companies may use this information to support the products and services you request or market additional products and services to you. These activities may include providing customer service, processing transactions, or offering other Wave products and services. If you do not want us to share your Personal Information with companies related to us by common ownership or control for marketing purposes, please contact privacy@waveapps.com.
- **Business Partners.** We work closely with a variety of business partners that are not Wave companies (e.g., our bank partners). We may offer products jointly with our business partners. You will be able to recognize when a business partner is associated with your transaction when its logo appears or is shown with our logo. We may share information that is related to such

transactions with that business partner. Pursuant to our vendor management program, we require all business partners to have written contracts with us that require them to safeguard your information and prohibit them from selling, retaining, using, or disclosing your Personal Information for any purpose other than for the specific purpose of performing the contract.

IN SIMPLE TERMS

Online products like Wave need to interact with other business partners in order to work properly. When this involves sharing personal information, we're vigilant about ensuring the information is managed securely and responsibly.

- **Service Providers.** We may disclose your Personal Information to service providers who perform business functions on our behalf. For example, we may use service providers to host our website, to process payments or provide Payroll services. We may share your personal information to facilitate the integration of the service provider into our services. We may also share your Personal Information, and a record of any transactions you conduct on our website or offline with us with a third-party advertising partner and its service providers to deliver advertising tailored to your interests when you visit certain other websites. Data shared for tailored advertising is made pseudonymous. Pursuant to our vendor management program, we require all service providers to have written contracts with us that require them to safeguard your Personal Information and prohibit them from selling, retaining, using, or disclosing your Personal Information for any purpose other than for the specific purpose of performing the contact. Your Personal Information may be maintained and processed by these third parties in other jurisdictions. We use service providers in Canada and the United States. When your information is in another jurisdiction, it will be subject to their laws. We only share the information these service providers need to perform the service and we don't authorize them for any other use or disclosure of Personal Information.

IN SIMPLE TERMS

We also occasionally need to share personal information with service providers. This is especially true for complicated tasks like transferring money electronically. We take the same high level of caution, and ensure the information is used only for the purposes needed.

- **Marketing Arrangements.** We may provide Personal Information to companies with whom we have a joint marketing arrangement. Pursuant to

our vendor management program, we require all marketing service providers to have written contracts with us that require them to safeguard your Personal Information and prohibit them from selling, retaining, using, or disclosing your Personal Information for any purpose other than for the specific purpose of performing the contract. We do not share your Personal Information with third parties for their marketing purposes without your consent or without providing you with the opportunity to opt out of such sharing.

IN SIMPLE TERMS

We require all marketing service providers to safeguard your personal information. They are not allowed to sell your information or use it for additional purposes without your consent.

- **Persons Who Acquire Our Assets or Business.** If we sell or transfer any of our business or assets (including insolvency or bankruptcy proceedings), certain information about our customers may be a part of that sale or transfer. In the event such sale or transfer results in a material change to this privacy policy, we will notify you. The notification procedure will be the same as the procedure we use to notify you of a change to this privacy policy as described below.

IN SIMPLE TERMS

If the ownership of Wave changes, customer information may be included in the transfer of ownership. Rest assured, we'll let you know if that change causes material updates to these policies.

- **Responses to Legal Requests.** We may disclose your Personal Information when we have a good faith belief that such disclosure is required or permitted by law pursuant to a legal request. This may occur in connection with a court order, legal process, or other judicial, administrative, or investigative proceeding that produces a request for information from us. In certain situations, we may be required to disclose your information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

IN SIMPLE TERMS

When laws require us to share customer information with the proper authorities, we're obligated to do so.

- **Protection of Wave and Others.** We may disclose your Personal Information when we believe that disclosure is necessary to protect either your or our rights and safety. We may disclose your Personal Information to federal, state, provincial, or local officials in order to, and only to the extent necessary, inform the official of activities that may constitute, or may have constituted, a violation of any criminal law or to assist the official in investigating or prosecuting a violation of criminal law.

IN SIMPLE TERMS

Like the point above, information may be shared with government authorities when legally required.

- **Aggregate Data.** We may disclose aggregate information compiled using information that does not identify you individually or personally. This may include, for example, the total number of visitors from a particular geographic area or the average user age.

IN SIMPLE TERMS

Some summarized, anonymous information may be shared publicly, but could never be connected to individual customers.

- **Third-Party Online Advertisements.** We may allow third parties to place advertisements for their products or services on our website. If you interact with these advertisements, you must disclose your personal information (e.g., IP address) to these advertisers. If you click on a third-party advertisement, you will be directed to their website and your interactions with them will be governed by their privacy notice.

IN SIMPLE TERMS

If you interact with a third-party ad, your personal information will be disclosed to the advertiser and will be subject to their privacy policy.

3. Consent

Your Choices

Some United States jurisdictions, such as California, Colorado, Connecticut, Virginia, and/or Utah, may give you a right now, or in the future, to make the following choices regarding your Personal Information.

- **Access To Your Personal Information.** You may request access to your Personal Information or confirmation that we have Personal Information about you. In certain limited circumstances, you may also request to

receive access to your Personal Information in a portable, machine-readable format.

- **Changes To Your Personal Information.** You may ask us to correct Personal Information we have about you that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Deletion Of Your Personal Information.** You may request that we delete your Personal Information. If required by law, we will grant a request to delete your Personal 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.
- **Opt-Out of Sharing for Cross-Contextual Behavioral Advertising.** You may request that your Personal Information not be shared for the purpose of cross-contextual behavioral advertising.
- **Online Tracking.** We do not currently recognize the “Do Not Track” signal.
- **Emails.** Where permitted by law, we may use your Personal Information to communicate with you about products and services. If at any time you wish to limit your receipt of promotional communications, you may contact us at privacy@waveapps.com, or follow the unsubscribe instructions included in each marketing communication you receive from us.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

Submitting the Personal Information of Others

When you submit the Personal Information of your customers or employees to us, you are responsible for informing such customers and employees about Wave, and for obtaining any necessary consent or authority from them, including informing them that Wave operates within Canada and utilizes service providers within the United States. In addition, your Personal Information will be accessed by Wave employees outside of Canada and the United States for business purposes.

You may also choose to refer someone to our Site or through our referral program. We may ask for that person’s name and contact information, including email address. We will send them a single invitation email to the address you provide. Please ensure that you only submit email addresses of individuals or businesses with whom you have a relationship and who would want to receive the message.

Closing your Wave Account

At any time and without penalty, you can close your Wave account and stop using our services. Please ensure you complete the account closure process which includes a confirmation email. Otherwise, your account may not be closed.

IN SIMPLE TERMS

We'd be sad to see you go, but if you do, we won't make closing your account a hassle. Just don't forget the confirmation email to make it official.

How May I Opt Out of Email Communications?

You may choose to limit our use or our ability to share your information in certain circumstances. Our ability to offer you certain products and services and your experience may be affected by your choice. If at any time you wish to limit our sharing of your Personal Information with our affiliates or nonaffiliates, you may contact us at privacy@waveapps.com. You may, however, continue to receive email communications related directly to the services and products you purchase, such as payment receipts.

- Certain non-commercial communications may still be sent to you that are required to provide you with our services. For example, system notifications, major product changes, changes to our Terms of Use or Terms of Service, or other news that we believe will materially affect how you interact with Wave.
- The only way to completely stop all emails from Wave is to close your account as outlined above.

Where permitted by law, we may use your Personal Information (subject to your consent, where required) to communicate with you about products and services available through Wave or our business partners. If at any time, you wish to limit your receipt of such communications, you can opt out of such commercial email communications by clicking on the unsubscribe link in such emails, via the Email Preferences settings in your account, or by contacting us at privacy@waveapps.com. At your request and subject to the limitations below, we will make reasonable efforts to limit all such marketing communications to you. We will respond to requests within a reasonable timeframe.

The above paragraphs only apply to the Personal Information we obtain through your use of our services covered by this privacy policy. You may still receive offers from us or other Wave companies where they obtain your contact information through other sources.

Please see Section B.7 for information on how to opt out of various web and wireless technologies we use.

IN SIMPLE TERMS

We like to keep in touch and promise we won't overdo it. Still, if you'd ever like to opt out, we've made it easy. Heads up: If you opt-out of our marketing emails, we may still send you important, non-marketing messages, related to your Wave account.

4. Limiting Collection

Wave only collects the Personal Information necessary to provide the services to you. The services you use will determine most of the Personal Information Wave collects. We'll also provide you with the option of sharing additional information to enhance your Wave experience.

Wave may also use third-party services to supplement or enrich our understanding of our customers. This includes cross-referencing information like a name, business name, email address or IP address in third-party databases and using the information there to improve our understanding of you and your business.

IN SIMPLE TERMS

We only collect the personal information we need to deliver the services you want. What we collect depends on which services you use.

Some of the services allow you to provide access to your Wave account to other authorized users, which we call "guest collaborators". Guest collaborators have access to information in your Wave account, including Personal Information, and may perform various tasks on your behalf. You take full responsibility for any collection, use or disclosure of your Personal Information by your guest collaborator(s).

To provide access to your account to a guest collaborator, you must provide the guest collaborator's name and email address. We will send them a single email inviting them to the Site. Wave only uses this information to invite your guest collaborator. Please ensure that you only submit email addresses of individuals or businesses that you have a relationship with and who would want to receive the message. The guest collaborator may contact us at privacy@waveapps.com to request that we remove their name and email address from our database. This will remove the guest collaborator's ability to access or perform tasks on your behalf in your Wave account.

IN SIMPLE TERMS

You can allow someone else to access and use your Wave account. Be vigilant, as you are responsible for how that person uses the information they can access.

5. Limiting Use, Disclosure, and Retention

We will use and disclose your Personal Information as described in this policy. Some Wave employees who have access to your Personal Information outside are of Canada and the United States. Regardless of where a Wave employee is physically located, your Personal Information is protected by the safeguards described in this privacy policy.

In accordance with applicable laws, we keep your Personal Information for as long as needed to serve you, maintain your account, as needed to operate our business, or to improve our offerings or develop new ones.

We retain your information (including geo-location data) for as long as your account is active or as needed to provide you with services. We may retain or use your information as necessary to comply with our policies, legal obligations, resolve disputes, and enforce our agreements. To be clear, that means we'll retain your Personal Information while you have an active account, and afterward if we need to do so to meet our legal obligations.

If you choose to close your Wave account, we will destroy your Personal Information within sixty (60) days unless we are otherwise legally obliged to keep it longer consistent with our retention policies or if we determine it is necessary to defend against legal claims.

Please see Section A.9 for information on how to update or delete your information.

IN SIMPLE TERMS

We take our responsibilities about using, disclosing, and storing your personal information seriously. Unless we're legally required to keep it for longer, your information will be destroyed within sixty (60) days of closing your account.

6. Accuracy

Wave relies on you to provide us with information that is accurate and complete. We provide you with the mechanisms within your Wave account and rely on you to keep your information up to date. You can request updates or corrections of any inaccuracies in your Personal Information at any time by contacting us at privacy@waveapps.com. We will respond to your request within a reasonable timeframe.

IN SIMPLE TERMS

It's up to you to ensure the information you provide Wave is accurate. If you need to make changes, just let us know.

7. Safeguards

The security of your Personal Information is important to us. We utilize administrative, technical, and physical safeguards to protect your information. If you have any questions about the security of our services, you can contact us at security@waveapps.com. For additional details, please see our [security page](#).

We protect the information submitted to us, both during transmission and once we receive it. Nevertheless, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

We maintain administrative, technical, and physical safeguards that comply with applicable law and federal standards and that are designed to restrict access to your information. These safeguards include administrative controls (things like policies, procedures, and training), technical controls (things like encryption, firewalls, and secure coding frameworks), and physical controls (secured hosting environments).

If we collect sensitive information (such as your SIN or SSN), we will encrypt the transmission of that information using Transport Layer Security.

If we share your information with our service providers, we require all service providers to have written contracts with us that require them to safeguard your information and prohibit them from selling, retaining, using, or disclosing your information for any purpose other than for the specific purpose of performing the contract.

We may notify you by email, mail, or telephone in the event of a data security incident, and where permitted by law.

IN SIMPLE TERMS

From policies to software to physical measures, we do everything we can to protect your information. If you'd like more details, feel free to reach out.

We ensure that any third party acting on our behalf maintains reasonable and appropriate safeguards in respect of your Personal Information. Additional information about our third parties' privacy practices is available upon request.

IN SIMPLE TERMS

When we work with another partner, we make sure they're vigilant about protecting your information too.

You are also responsible for helping to protect the security of your Personal Information. For instance, never give out your email account information or your password for the services to third parties. Our team will never request your password or PIN, and we ask that you never post account or credit card numbers to our support channels.

IN SIMPLE TERMS

Here are some best practices to help you keep your information secure on your end.

8. Openness

This policy outlines our privacy practices. If you have questions about it, please contact our Privacy Officer at privacy@waveapps.com.

IN SIMPLE TERMS

We have someone to help if you have any questions about this document, so reach out.

9. Individual Access

You may access, update and correct inaccuracies in the Personal Information in our custody or control at any time, subject to limited exceptions prescribed by law. You may contact us regarding your information by contacting privacy@waveapps.com. If you are a Wave user, you may access your information through your Wave account and, where available, update that information. You can download or export data you input into the Site at any time, correct inaccuracies, or delete information, by simply logging in to your Wave account and making the necessary changes.

You can delete your Wave account through the “Manage Your Profile” and “Personal Information” screens where you will find the “Close Your Account” section. The types of information that you can access and update may change over time. Remember, some of the information we collect does not identify you personally or is not stored in an online accessible format and thus, may not be accessible through your Wave account.

When you update or delete your information, we may maintain a copy of the information in our records. Additionally, if you request that we permanently delete

your account or information, we may still retain and use your information as necessary to comply with our legal obligations.

If an unauthorized profile has been created about you, please contact us at privacy@waveapps.com to request to have it deleted. We will respond to your request within a reasonable timeframe.

IN SIMPLE TERMS

We've made it easy for you to access and update your information on your own by logging into your account. You're free to update or delete your information. We'll only hang on to anything we legally need to keep.

You can also request access, corrections, or updates to all your Personal Information, including information not available through your account, by contacting us as set out in this privacy policy. We may request certain Personal Information for the purposes of verifying the identity of the individual seeking access to their personal information records.

IN SIMPLE TERMS

Not all information can be edited by you in your account. For those cases, here's how to get it done.

B. ADDITIONAL DETAILS

1. Public Content and Social Media

Wave may have public forums and blogs. Any information submitted there may be read and collected by anyone. You may request removal of Personal Information from forum or blog posts and comments by contacting us at privacy@waveapps.com.

IN SIMPLE TERMS

When you post or provide information somewhere like a comments section or forum, other people may see it. If you'd like this information removed, get in touch and we'll get it done.

If you provide us with a testimonial, with your consent we may post it on our Site or in other materials and media, along with your name. If you want your testimonial removed, please contact us at privacy@waveapps.com.

You may engage with us through social media sites. When you engage with us on these sites, we may have access to certain information about your account (e.g., name, username). These sites may collect your IP address, how you're engaging with us, and may use cookies to enable the site to function properly. We may use this information to personalize your experience and to provide you with other products or services you may request.

IN SIMPLE TERMS

Same thing goes for testimonials you may have provided. If you'd like it removed, just ask.

2. Additional Information on Service Providers

We may use service providers to verify the bank account information you provide to us in providing our services to you.

- **Plaid.** Wave uses Plaid Inc. ("Plaid") to gather your data from financial institutions. By using our service, you grant Wave and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#).
- **Check HQ.** Wave has engaged Check Technologies, Inc., a Delaware corporation ("Check HQ"), to facilitate providing its customers with payroll related services. If you choose to use Wave's payroll services, you agree to your personal and financial information being transferred to and processed by Check HQ in accordance with its [privacy policy](#).

IN SIMPLE TERMS

In some cases, we work with external partners to make sure information is accurate and services can be provided. By using Wave, you agree to share your information with these partners.

We may also use services provided by third-party platforms (such as social networking sites) to serve targeted ads on such platforms to you or others, and we may provide a hashed version of your email address or other information to the platform provider for such purposes. To opt out of the sharing of your information with such platforms, please send an email to privacy@waveapps.com.

IN SIMPLE TERMS

When third parties are involved, we keep your details anonymous.

3. California Consumer Privacy Act

California law requires us to disclose the following additional information related to our privacy practices. If you are a California resident, the following privacy disclosures apply to you in addition to the rest of the privacy notice.

- **Categories of Personal Information Collected and Disclosed.** California law requires organizations to disclose whether certain categories of personal information are collected, disclosed for an organization’s “business purpose”, or “sold” and/or “shared” for purposes of cross-context behavioral advertising (as those terms are defined under California law). We may collect, share, and disclose personal information that is subject to the Gramm-Leach-Bliley Act and other federal laws. Such information is not subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively “California Privacy Law”), and while not required, may be included in the table below. In addition, we may have collected, shared, and disclosed personal information in various contexts that may be subject to California Privacy Law, which is reflected in the table below. Please note that the following table is comprehensive, and we collect different information about people based on their relationships and interactions with us.

Please note, in addition to the recipients identified below, we may disclose any of the categories of personal information we collect to government entities, as may be needed to comply with law or prevent illegal activity, or professional services organizations, such as auditors and law firms. We do not “sell” your personal information for money. As discussed elsewhere in this privacy notice, we use cookies and similar tracking technologies for purposes of targeted advertising. The types of information that you can access and update may change over time. Remember, some of the information we collect does not identify you personally or is not stored in an online accessible format and thus, may not be accessible through your Wave account. For more information, please see Section B.7.

Categories of Personal Information Collected	Categories of Recipients	
	Disclosures for Business Purposes	Sharing for Cross Context Behavioral Advertising
Identifiers – such as name, postal address,	<ul style="list-style-type: none">● Affiliates or subsidiaries● Business partners	<ul style="list-style-type: none">● Advertising networks

<p>unique personal identifier, online identifier, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Data analytics providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	
<p>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include signature, physical characteristics, or description, insurance policy number.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> • N/A
<p>Government Issued Identification – such as social security number or other government identification number (e.g., Social Insurance Number, EIN and TIN)</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> • N/A
<p>Financial Information – such as bank account number, credit card number, debit card number, and other financial information.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> • N/A
<p>Commercial information – such as information about products or services purchased, obtained, or considered,</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Joint marketing partners • Operating systems and platforms 	<ul style="list-style-type: none"> • Advertising networks

<p>or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> ● Other Service Providers ● Payment processors and financial institutions ● Professional services organizations, this may include auditors and law firms 	
<p>Internet or other electronic network activity information – such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> ● Affiliates or subsidiaries ● Business partners ● Data analytics providers ● Joint marketing partners ● Operating systems and platforms ● Other Service Providers ● Payment processors and financial institutions ● Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> ● Advertising networks
<p>Geolocation data</p>	<ul style="list-style-type: none"> ● Affiliates or subsidiaries ● Operating systems and platforms ● Other Service Providers 	<ul style="list-style-type: none"> ● Advertising networks
<p>Audio, electronic, visual, thermal, olfactory, or similar information – such as call recordings or video surveillance.</p>	<ul style="list-style-type: none"> ● Affiliates or subsidiaries ● Operating systems and platforms ● Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> ● N/A
<p>Professional or employment-related information</p>	<ul style="list-style-type: none"> ● Affiliates or subsidiaries ● Operating systems and platforms ● Other Service Providers ● Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> ● N/A
<p>Inferences drawn from any of the information listed above</p>	<ul style="list-style-type: none"> ● Affiliates or subsidiaries ● Business partners ● Data analytics providers ● Joint marketing partners ● Operating systems and platforms ● Other Service Providers ● Payment processors and financial institutions ● Professional services organizations, this may include auditors and law firms 	<ul style="list-style-type: none"> ● Advertising networks

- **California Sensitive Information Disclosure.** Some of the personal information we collect is considered “sensitive personal information” under California law. We collect the following categories of sensitive personal information (as defined under California law): Social security, driver’s license, state identification card, or passport number; and account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. This information is collected in order to process transactions, comply with laws, manage our business, or provide you with products and 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.

- **Your Privacy Rights.** If you are a California resident, you may have the following rights over your information:
 - For the period covering the twelve (12) months preceding your request, you may request that we disclose to you the categories and specific pieces of information collected about you, as well as certain information about our collection and use of your personal information.
 - You may request that we delete the information we collected from you, subject to certain exceptions.
 - You may request that we correct inaccuracies in the personal information that we maintain about you.
 - You may opt out of the sharing of your personal information for purposes of cross-context behavioral advertising.
 - You have the right not to be discriminated against for exercising your rights over your information.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity.

You, or an authorized agent acting on your behalf, may submit a request to exercise your rights by contacting ccpa-requests@waveapps.com or calling us toll-free at 1 (877) 596-0796. We will collect Personal Information from you, such as your name, address, state of residence, email address, phone number, last four

(4) digits of your social insurance number or social security number, and your birth year, to verify your identity in order to process your request. To have an authorized agent submit a data subject access request on your behalf, we require you to submit a form that verifies your identity and that you have authorized the agent to act on your behalf. Government identification may be required.

To prevent online tracking based targeted advertising (e.g., cookies), opt out of social media and targeting/advertising cookies in the prompt presented to you in our cookie banner. You may change your cookie setting preferences by clicking on “Cookies Settings”.

- **California Notice of Financial Incentive.** We offer certain programs, such as our referral program, that provides financial rewards to those of our customers who have elected to participate (the “Program”). When you apply for and have been accepted into the Program, we typically ask you to provide your name and contact information (such as your email address), as well as the contact information for individuals you will refer to us. Under California law, our Program might be interpreted as a “financial incentive” program as it involves the collection of personal information. We do not assign a monetary value to the information we collect. Based on our reasonable estimate, the value of the personal information you provide to us is related to the value of the referral provided and commission paid through the Program. This value is based on the expense related to offering those free or discounted products or services. You or any person you refer to us may withdraw from participating in the Program at any time by contacting us at privacy@waveapps.com.

IN SIMPLE TERMS

Some states have different laws. Here’s the way things work in California.

4. General Data Protection Regulation

We process your Personal Information to provide the products and services you request and for our legitimate business interests, including marketing.

Our services are hosted on servers located in Canada and the United States. We also use service providers located in Canada and the United States to provide you with our services. The transfer of your Personal Information, and the information you input into our services, to Canada and the United States is necessary to deliver our services. Please be aware that the laws in Canada or the United States may not provide the same level of protection to your Personal Information as your home country.

IN SIMPLE TERMS

Most of what we do happens in Canada and the United States. So, the information you provide will likely pass through these two countries.

If you are accessing our services from the European Union, you may have certain rights regarding the processing of your Personal Information. For instance, if the information you provide contains special categories of personal data, we will only process it with your explicit consent, which can be withdrawn at any time.

You may have the following additional rights:

- You have the right to access and correct your information.
- You have the right to obtain erasure of your information, object to or restrict processing activities related to your information or withdraw your consent to the processing of your information after you have provided it.
- You have the right to obtain a copy of your information in a structured, commonly used, machine readable format.
- You have the right to lodge a complaint with your local supervisory authority regarding our processing of your information.

To exercise your rights, or if you otherwise have questions about the processing of your personal data, you may contact us at privacy@waveapps.com.

IN SIMPLE TERMS

Like California, the European Union provides residents with unique rights and responsibilities.

5. Brazil

If you are accessing our products or services from Brazil, you have certain rights regarding the processing of your personal information.

You have the right:

- To confirm if we are processing your information;
- To access your data; to correct incomplete, inaccurate or out-of-date data;
- To anonymize, block, or delete unnecessary or excessive data or data that is not being processed in compliance with Brazilian law;
- To the portability of data to another service or product provider, by means of an express request;
- To delete personal data processed with the consent of the data subject;
- To information about public and private entities with which the controller has shared data;

- To information about the possibility of denying consent and the consequences of such denial;
- And to revoke consent.

To exercise your rights, or if you otherwise have questions about the processing of your personal data, you may contact us at privacy@waveapps.com.

IN SIMPLE TERMS

Like the European Union, Brazil provides residents with unique rights and responsibilities.

6. Visiting the Site and Using the Mobile App

In general, you can visit the Site without telling us who you are or submitting any Personal Information. However, we collect certain information and usage data whenever you interact with us, whether online, through a mobile application, or through email. We and/or our service providers (such as Google Analytics) collect which websites you visit, what you click on, when you performed those activities, your IP (Internet protocol) addresses from all visitors to the Site and other related information such as page requests, browser type, operating system, and average time spent on our Site. When you use our mobile app, we also collect device type, operating system, unique device identifier, and date and time stamp. This information is used to help us understand the activity on, and to monitor and improve, our Site and mobile app.

IN SIMPLE TERMS

To help make our app and website the best they can be, we look at information on how these tools are used.

7. Use of Web and Wireless Technologies (including Cookies, Tags, and Web Beacons)

We, and our service providers, use commonly used technologies, such as cookies or similar technologies, to remember you and to personalize your experience with features and advertisements. We, and our service providers, use these technologies to help us know your usage patterns, track your preferences, analyze how you use our services, administer the website and mobile application, and gather demographic information about our user base, as a whole. We may receive reports on an individual or aggregate basis based on these technologies. You may opt-out of some of these technologies.

- **Cookies.** Cookies are small alphanumeric identifiers that a web server transfers to your computer or mobile device via your Internet browser. When your Internet browser visits a web page, a cookie is set with a unique

number. This number is recorded in a small text file that is transmitted to your computer or mobile device and stored in the cookie directory of your hard drive. Then, when you visit each web page or component of our service or mobile application on which the cookie technology is enabled, the website or mobile application can recognize your browser as a unique user.

The purpose of cookies is to make your experience more convenient and personal. For example, knowing what products interest you, helps us tailor your experience to meet your needs. We also have service providers that use cookies on our website to facilitate measurement and reporting. We also use cookies for session tracking to make it possible to navigate the secure environment inside our website and application. These cookies (1) may let us know who you are, (2) are necessary to access your account, and (3) will give us information that we can use to personalize our website and application according to your preferences. You can control the use of cookies in your browser. If you disable cookies, you will not be able to access your account or take advantage of all of the features of the website and application.

We, or service providers acting on our behalf may use cookies and similar tracking technologies to collect information and infer your interests for interest-based advertising purposes. If you would prefer to not receive personalized ads based on your browser or device usage, you may generally express your opt-out preference to no longer receive tailored advertisements. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests.

To opt out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit the [Digital Advertising Alliance \(DAA\)](#)'s self-regulatory opt-out page, the [Digital Advertising Alliance of Canada](#)'s self-regulatory opt-out page, the mobile application-based [AppChoices](#) download page, the [European Interactive Digital Advertising Alliance \(EDAA\)](#)'s consumer opt-out page, or the [Network Advertising Initiative \(NAI\)](#)'s self-regulatory opt-out page.

In the mobile environment, most mobile operating systems offer device-based opt-out choices that are transmitted to companies providing interest-based advertising. To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions pages, or read more about

sending signals to limit ad tracking for your operating system [here](#).

Please note that these settings must be performed on each device (including each web browser on each device) for which you wish to opt out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

You may also adjust your browser settings to accept or deny all cookies, or to request your permission each time a site attempts to set a cookie. Although cookies are not required for some parts of our services, our services may not work properly if you disable cookies entirely. Clearing cookies from your web browser may revoke a prior opt-out you have selected.

IN SIMPLE TERMS

Cookies, while delicious, are also a helpful way of providing you with a smooth experience. You can turn cookies off in your browser, but the site may not work properly if you do.

- **Local Storage Objects HTML5.** We, and third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity, use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.
- **Clear GIFs or Web Beacons.** We employ a software technology called clear GIFs (also known as pixel tags or web beacons), that help us better manage content on our websites by allowing us to understand usage patterns, fix issues, and improve the products and services offered to you on our websites. We may use clear GIFs in our emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. These activities may be performed by us or a service provider acting on our behalf.
- **Log Files.** Like most websites, we use log files. Information collected in log files may include IP addresses, unique device IDs, browser type, Internet Service Provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), platform type, date/time stamp, and number of clicks. We utilize this information to analyze trends, administer the site or mobile application, track user movement in the aggregate, and gather broad demographic information for aggregate use.

- **Traffic Data.** We collect information relating to traffic on our website. We may collect and record information on pages visited, mouse movements and clicks, scrolling activity, keystroke data that you voluntarily enter on our website, HTML data on a page visited, IP address or information your browser provides to our web server, such as browser type, operating system, average time spent on our website or mobile application, language, screen resolution, referring URL, etc. Our collection of website traffic information is anonymized and does not include personally identifiable information. We utilize this data to improve our website and the products and services offered to you.
- **Online Behavioral Advertising.** We allow third-party companies, such as Google Ads, to serve ads and collect certain pseudonymous information when you visit our websites. These companies may use this information (e.g., clickstream information, browser information, time and date, device ID, geo-location, IP address, or subject of advertisements clicked or scrolled over), during your visits to our websites in order to provide advertisements about goods and services likely to be of interest to you and to enhance your consumer experience across the different devices that you use. These companies typically use a cookie or third-party web beacon to collect this information. We may engage different providers to provide similar services from time to time. To opt out of this type of advertising you may refuse to accept cookies or by visiting the [Network Advertising Initiative's](#) opt-out page. The options you select are browser and device specific. You may also opt out of this kind of advertising by adjusting the browser settings on your device. Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked.
- **Mobile Device Information.** We may record data from your mobile device such as Apple IDFA, device brand and model, general characteristics of your device, and other device IDs.
- **Mobile Analytics.** We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personal information you submit within the mobile application.

IN SIMPLE TERMS

Although we track web activity, we only collect information as required and to improve what we offer. You can opt out of some of these technologies.

How do we respond to web browser “do not track” signals?

We treat the Personal Information of everyone who comes to our Site in accordance with this privacy policy, whatever their “do not track” setting. While we do not respond to web browser “do not track” signals, we give you choices about receiving promotional offers from us or third parties. You can exercise your choices as described in this privacy policy.

If you are located in California, you may prevent us from storing cookies on your device to enhance site navigation, analyze site usage, and assist in our marketing efforts by declining cookies in the cookie banner presented to you when you visit our website.

IN SIMPLE TERMS

Although we track web activity, you can choose to receive or not receive promotional offers from us.

8. Notification of Privacy Policy Changes

We may update this privacy policy to reflect changes to our information practices. If we make a material change to this privacy policy, including a material change in the way we use any Personal Information, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our website at least 30 days prior to the change becoming effective. We encourage you to periodically review our privacy policy for the latest information on our privacy practices.

IN SIMPLE TERMS

It’s a good idea to check in on this policy here and there for updates. If the updates are significant, we’ll let you know.