



Tumoni, Inc.

Corporate Compliance

GLBA Annual Privacy Notice

Review: 05/16/2024



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FACTS

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and Government issued ID
- Device Data
- Location & IP Data
- Proof of residence or address
- Income & Proof of Income
- Transaction history or statements of other financial products
- Payment history
- Employment information

When you are *no longer* our customer, we continue to share your information as required by GLBA regulation (6 years).

How?

All financial companies must share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information: the reasons Tumoni chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information.

Does Tumoni share?

Can you limit this sharing?

For our everyday business purposes— such as processing your transactions, maintaining your account(s), responding to court orders and legal investigations, or reporting to credit bureaus.

YES

NO

For our marketing purposes— to offer our products and services to you

YES

NO

For joint marketing with other financial companies

YES

NO

For our affiliates' everyday business purposes— information about your transactions and experiences

YES

NO

For our affiliates' everyday business purposes— information about your creditworthiness

NO

YES

For our affiliates to market to you

NO

YES

For nonaffiliates to market to you

NO

YES

Questions?

Call +1 (585) 636-2311 or send an email to help@tumoni.com.

**Who we are****Who is providing this notice?**

TUMONI, Inc (“Tumoni”; “TUMONI”)

What we do**How does Tumoni protect my personal information?**

We use security measures that comply with federal law to protect your personal information from unauthorized access and use. These measures include computer safeguards and secured files and buildings.

We possess a proprietary cybersecurity infrastructure that includes an abstraction layer that limits all our affiliates and third-party vendors' access to information unrelated to the contracted service. Your personal data is also kept encrypted at rest and in transit.

How does Tumoni collect my personal information?

We collect your personal information, for example, when you:

- open an account or deposit money.
- transfer funds
- pay your bills
- use your Tumoni debit card

We also collect your personal information from others, such as affiliates or other financial companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing information about your creditworthiness for affiliates' everyday business purposes.
- affiliates from using your information to market to you.
- sharing for nonaffiliates to market to you.

State laws may give you additional rights to limit sharing. (See below for more on your rights under state law.)

Definitions**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Non-Affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Joint marketing

A formal agreement between non-affiliated financial companies that market financial products or services to you.

Other important information



Monitoring and call recording: If you communicate with us via our phone lines, we will monitor and record the whole interaction.

Rights under State laws: It is possible that you may have privacy rights related to state legislation. The general rule is that whichever state right is not mentioned or regulated by the GLB Act (Federal legislation) must be respected, and the financial institution must reasonably comply within its discretion, as long as it does not undermine or replace additional federal regulation.

Vermont Residents: we will never share the information we compile from you to non-affiliated third parties, except as permitted by law:

- With your explicit consent.

Privacy Rights and Information for California Residents:

- According to the CCPA exemptions, "Financial Institutions shall follow GLBA Data privacy obligations (i.e., those requirements related to the collection, use, and volitional sharing of the personal data) and are exempt from state obligations on this specific matter.
- This does not, however, exempt Tumoni from having to follow the data security requirements of the CCPA. (i.e., those requirements related to the protection of personal data). As a result, the California Attorney General ('AG'), the California Privacy Protection Agency ('CPPA'), and private plaintiffs may still initiate legal actions against Tumoni for alleged data security failures that lead to data breaches.