



# Privacy Policy

Last modified September 2025

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## Privacy Policy

Clair Inc and its subsidiary Maverick Payments Inc. d/b/a Clair (together "Company" or "We" or "Clair") facilitate the provision of financial services, including wage advances. Clair respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy explains and governs how Clair collects, uses, discloses, and otherwise processes personal information or personal data when you download, access, or use the Clair website or any related web or mobile application experience (the "Applications") as well as any content, functionality, products and services offered by or through the Applications (the "Services").

### Scope

Personal information or personal data refers to any data or information which relates to an identified or identifiable natural person, and are subject to applicable data protection laws, including the EU General Data Protection Regulation 2016/679 ("GDPR") or the California Consumer Privacy Act (Assembly Bill 375), as amended ("CCPA").

Clair is a data processor (under GDPR) or service provider (under CCPA) and users of the Clair Applications or Services are the data controllers (under GDPR) or businesses (under CCPA) for such personal data or personal information. Additionally, Clair may act as an independent controller or business of personal information or personal data with respect to its own processing activities. In certain instances, Clair uses third-party processors and sub-processors to provide its Services.

Residents of California are afforded certain rights regarding their personal information or personal data. Under the CCPA, personal information or personal data refers to "information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device."

Clair's processing of personal information for the Services using the Applications is governed by this Privacy Policy. Clair may act as an independent controller or business of personal information or personal data with respect to its own processing activities.



Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use the Applications.

## Our Privacy Policy Explains:

- Information We Collect About You
- How We Use Your Information
- How We Share Information
- How We Retain and Protect Information
- Accessing and Correcting Your Information
- Persons Under the Age of 18
- Cross-Border Data Transfer
- Data Subject Rights under GDPR & Right to Request to Know or Request to Delete Under CCPA
- Additional Information Regarding European Union, Swiss, and UK Personal Data
- Additional Information Regarding California Personal Information
- Changes to the Product Privacy Policy
- Contact Us

## Information We Collect About You

As a user of the Clair Applications or Services, you will be asked to provide us with the following categories of information:

Category	Examples
A. Personal and Associated Identifiers.	First and last name, physical address, email address, telephone number, social security number, date of birth, employer, job title, bank account numbers
B. Internet or other similar network activity.	Information based upon your use of the Applications, including IP addresses, browsing history, search history, and information regarding your interaction with the Applications
C. App, browser, and device information	Information about the device information, including name of device and operating system, cookies and pixel tags, city of login, device characteristics or identifiers (e.g., plugins, the network you connect to) and other data that your browser automatically sends

We obtain the categories of personal information listed above from the following categories of sources:



- **Personal and Associated Identifiers:** Directly from you. When registering for the Services, create an account, or from forms you complete.
- **Internet or other similar forms of network activity:** Indirectly from you using cookies, web beacons, the equipment you use to access the Services, automatic data collection technology, and from observing your actions on the Applications.

## How We Use Your Information

Clair uses or discloses the personal information we collect for the following purposes:

- To provide, support, personalize, and develop the Applications
- To create, maintain, customize, and secure your account with us
- To process your requests for customer support, purchases, transactions, and payments and prevent transactional fraud
- To verify and authenticate your identity and account information
- To detect, prevent, and address fraud, criminal activity, or misuses of our Applications and to ensure the security of our IT systems, architecture and networks;
- To respond to inquiries and complaints
- To assist you through our AI chat service by answering inquiries, providing information, and offering recommendations
- To help maintain the safety, security, and integrity of the Applications and Services, databases, and other technology assets, and business
- Enforce the terms and conditions that govern the Services; and other agreements, including for billing and collection purposes
- For testing, research, analysis, and product development, including to develop and improve the Applications and Services
- In an aggregated, de-identified, anonymized, and generic manner: to market the Services, survey usage, set benchmarks, feature suggestions, product analytics, and develop new product features or Services

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## How We Share Information

We may share the information or data we collect, or you provide as described in this Privacy Policy:

- With your consent and to the extent necessary to provide the Services
- With subsidiaries and corporate affiliates
- With service providers (including payroll providers, processors, sub-processors, and vendors who help us with fraud prevention and identity verification) and other third parties for a business purpose (e.g., to help us provide, manage, and improve our Services). When we disclose personal information for a business purpose, we enter a



contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

- With your consent with Plaid Inc. ("Plaid"), Clair uses Plaid to gather your data from financial institutions. By using the service, you grant Clair and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid end user privacy policy.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Clair, and/or that of you or others
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the Applications users is among the assets transferred

## How We Retain and Protect Information

Clair retains personal information or personal data for as long as necessary to (a) provide the Services; (b) comply with legal obligations; and (c) resolve disputes. Clair uses appropriate, commercially reasonable physical, electronic, and procedural safeguards to protect personal information and data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction in accordance with applicable law. We cannot, however, guarantee that any safeguards or security measures will be sufficient to prevent a security problem. We recommend that our customers take steps to protect against unauthorized access to any devices, networks and applications connected to the Services.

## Accessing and Correcting Your Information

You can review and change your personal information by logging into the Clair Applications and visiting your account profile page.

You may also send us an email at [support@getclair.com](mailto:support@getclair.com) to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## Persons Under the Age of 18

In compliance with the Children's Online Privacy Protection ("COPPA"), the Applications are not intended for persons under 18 years of age. No one under age 18 may provide any



information to or on the Applications. We do not knowingly collect personal information or data from persons under 18. If you are under 18, do not use or provide any information or data on the Applications. If we learn we have collected or received personal information or data from a person under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at:

228 Park Ave S PMB 31693  
New York, New York 10003-1502 US  
[support@getclair.com](mailto:support@getclair.com)  
+1 (833) 462-5247

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your California Privacy Rights for more information](#).

## Cross-Border Data Transfer

Clair provides its Services primarily from the United States, where we are headquartered. To provide the Services, Clair or its sub-processors may transfer personal information or personal data about its end users outside of the country in which end users are located, including to the United States or to other jurisdictions that may not be subject to equivalent data protection laws.

When transferring personal information or personal data across borders we take steps reasonably necessary to ensure that the information or data is subject to appropriate safeguards, is treated securely and is transferred under an approved data transfer mechanism pursuant to applicable data protection laws.

## Additional Information regarding European Union, Swiss, and UK Personal Data

Clair's legal bases for our processing of personal information is based on one or more of the following:

<b><u>Bases for Processing</u></b>	<b><u>Explanation</u></b>
Consent	The consent provided to us when you share or submit personal information to us.



Legitimate Interest	For example, we may use your data for fraud and security monitoring to ensure our networks and the Applications are secure, to administer or conduct our business (for example, recordkeeping and billing), and to respond to your inquiries and complaints.
Legal Obligation	Our compliance with a legal obligation that we are or may be subject to.
Contract	Our performance of other agreements with you.

## Data Subject Rights under GDPR & Right to Request to Know or Request to Delete under CCPA

Clair will not collect, retain, share or use personal information except as necessary to provide the Services. We do not sell, as defined under CCPA, personal information. As the data controller, Clair is responsible for responding to your request to exercise any right afforded you under applicable data protection law, including the GDPR and the CCPA.

## Changes to This Privacy Policy

Clair may change this Privacy Policy from time to time by publishing a revised Privacy Policy on the Applications. Your continued use of the Applications after we make changes is deemed to be acceptance of those changes.

## Contact Information

If you have any questions or comments about this Privacy Policy, please do not hesitate to contact us at:

228 Park Ave S PMB 31693  
New York, New York 10003-1502 US

[support@getclair.com](mailto:support@getclair.com)

+1 (833) 462-5247