

Coba Technologies, Inc. Privacy Policy

Effective as of April 18, 2025

Coba Technologies, Inc. ("Coba," "we," "our," or "us") provides a technology platform that allows businesses to access financial products and services issued by regulated financial institutions, including Monex USA, Inc. ("Monex USA"). This Privacy Policy explains how we collect, use, and share your information when you use our services.

This Privacy Policy only applies to services offered directly by Coba. Any financial services or products, such as currency holding accounts or EFTs among other services, are offered and governed by Monex USA under their own terms and privacy policies. By using our platform, you consent to the collection and use of your data as outlined in this policy and acknowledge that your data will be shared with Monex USA for account provisioning and support. While Coba is not a bank, it may be considered a "financial institution" under the Gramm-Leach-Bliley Act (GLBA) due to its role in facilitating access to financial accounts and handling sensitive financial data. As such, Coba adheres to GLBA-aligned practices regarding the collection, use, and safeguarding of nonpublic personal information, even though Coba services are intended exclusively for business users and not for personal, family, or household purposes.

GLBA Privacy Notice

Gramm Leach Bliley Act (GLBA) Privacy Notice

FACTS	WHAT DOES Coba Technologies, Inc. ("Coba") DO WITH YOUR PERSONAL INFORMATION?
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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ● Federal ID number including: <ul style="list-style-type: none"> ○ Social security number in the United States or Tax ID ○ Tax ID ("RFC"), Federal ID ("CURP") for Mexico ● Income ● Account balances and transaction history ● Payment history ● Employment information ● Account information <p>When you are no longer a Coba customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customer personal information to run their everyday business. In the section below, we list the reasons financial companies can share the personal information of their customers, the reasons Coba chooses to share, and whether you can limit this sharing.

Reasons we Can Share your Personal Information		Does Coba Share?	Can you Limit This Sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report 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		Yes	Yes
For our affiliates to market to you		Yes	Yes
For nonaffiliates to market to you		Yes	Yes
To Limit our Sharing	Call 1-888-315-2622 or +1-737-260-0512 Please note:If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. If you’re an <i>existing</i> customer and have opted out previously, you don’t need to update your privacy choices again. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing using the details above.		
Questions?	Contact us at 1-888-315-2622 or +1-737-260-0512		
Who We Are			
Who is providing this Notice?	Coba Technologies, Inc.		
What We Do			
How does Coba protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We restrict access to your personal information to our employees who need to know that information to provide your products and services.		
How does Coba collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none">• Open an account• Pay your bills• Provide account information• Provide employment information• Request or transfer funds We also collect your personal information from others, such as credit bureaus, affiliates and other companies.		

Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for everyday business purposes of our affiliates • Sharing for affiliates to market to you • Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Affiliates could include an affiliated retailer or an affiliated financial company</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Non-affiliates could include tax preparation companies, insurance companies, direct marketing companies and banks.</i>
Joint Marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Joint marketing partners could include financial service companies, such as banks, insurance providers, investment companies, securities broker-dealers and credit card companies.</i>

Other Important Information

Call Monitoring and Recording: If you communicate with us by telephone, we may monitor or record the call.

Rights Under State Law: You may have privacy rights under various state laws. We will comply with these laws to the extent they apply.

For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account.

For Vermont Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account.

Privacy Policy

At Coba, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

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What this Privacy Policy Covers

It is the policy of Coba to protect customer Personally Identifiable Information (PII), or any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular customer. Examples of PII could include, but are not limited to full name, social security number, passport number, bank account information, credit card number, or driver's license number. PII is also known as Non-Personal Public Information (NPI). This Policy outlines the regulatory requirements and provides guidelines on Coba's privacy practices, including how Coba collects, uses, and discloses your information. Coba takes all necessary steps to safeguard private information that has been provided by its customers. This Policy outlines Coba's practice regarding use of PII for individuals who become our customers, and former customers.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
Profile or Contact Data	• First and last name	• Service Providers

	<ul style="list-style-type: none"> • Email • Phone number • Unique identifiers such as passwords 	<ul style="list-style-type: none"> • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Identifiers	<ul style="list-style-type: none"> • Social security number • Driver's license number • Passport number • Cultural or social identifiers (for example, being a skateboarder, a Green Bay Packers fan, an environmental activist, etc.) 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Payment Data	<ul style="list-style-type: none"> • Payment card type • Last 4 digits of payment card • Billing address, phone number, and email 	<ul style="list-style-type: none"> • Service Providers (specifically our payment processing partners, currently Stripe, Inc. and Plaid Inc)
Commercial Data	<ul style="list-style-type: none"> • Purchase history • Consumer/Customer profiles 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Device/IP Data	<ul style="list-style-type: none"> • IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Web Analytics	<ul style="list-style-type: none"> • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Social Network Data	<ul style="list-style-type: none"> • Email • Phone number • User name • IP address • Device ID 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Consumer /Customer Demographic Data	<ul style="list-style-type: none"> • Age / date of birth • Zip code • Gender • Race • Ethnicity 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Professional or Employment-Related Data	<ul style="list-style-type: none"> • Resume • Job title • Job history • Performance evaluations 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information • GPS data 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Biometric Data	<ul style="list-style-type: none"> • Fingerprints • Faceprints 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners

	<ul style="list-style-type: none"> • Iris scans 	<ul style="list-style-type: none"> • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Sensory Data	<ul style="list-style-type: none"> • Photos, videos or recordings of your environment 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Inferences Drawn From Other Personal Data Collected	<ul style="list-style-type: none"> • Profiles reflecting user attributes • Profiles reflecting user behavior 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or letters you send us 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate

Banks, Regulated and/or Licensed Institutions are “partners” with whom we may share any or all of Personal Data about you or related to you. Such partners, payment networks and third party Vendors and service providers that process data or connect you or us to bank accounts are referred to collectively as “**Partner Financial Institutions.**”

In addition, we may collect the following information about individuals or businesses (“**Data**”):

- *Individuals’ Information:* name or aliases, physical address, work address, phone number, email address, IP address, date of birth, gender, local tax identification number, result of sanctions screenings, government ID, photo identification, selfie, or video authorization, images of your face on your identification document (e.g., government-issued identification card) and/or video, your biometric facial identifiers, and other additional information you may provide, or additional information we may additionally request you to provide (collectively the “Individual’s Information”);
- *Bank Account Information:* financial institution name, account name, account type, branch number, account number, routing number, international bank account number (“IBAN”), information, data, passwords, authentication questions, materials or other content, transaction and available balance information;
- *Financial Data of Your Account With Us:* transactions and transaction history, including but not limited to ACH, Wire and card transactions, available account balance, card data, loan and debit amounts, loan types, payment plan, loan balance, linked bank accounts, salary and other income, sources of wealth, and other assets;
- *Background Check Data:* background check information including credit and criminal checks, supporting research, and screenings, to the extent required or permitted by local law;
- *Recipients’ or Senders’ Data:* when you send or request money through the Services, we may collect data such as name, postal address, telephone number, IP address, date of birth, and financial account information about the recipient or sender of the funds. The

extent of data required about a recipient or sender may vary depending on the Services you are using to send or request money;

- *Third-Party Sources*: we may obtain information from third-party sources, merchants, recipients and senders of funds, data providers, identity verification providers, and credit bureaus, where permitted by law.
- *Digital Identity Information*:
 - *Services Metadata*: when you interact with the Services, metadata is generated that provides additional context about the way you interact with the Services.
 - *Log Data*: our servers may automatically collect information about your visit to the Mobile App, including IP addresses and associated information, browser type and settings, the date and time the Services were accessed and used, information about browser configuration and plugins, language preferences.
 - *Device Information*: your device “fingerprint” (e.g. hardware model, operating system and version, unique device identifiers and mobile network information) when you access our Mobile App or use a Service.
 - *Location Information*: we may receive information from you that helps approximate your location, such as using an IP address received from your browser to determine an approximate location. Further, we may also collect location information from devices in accordance with the consent process provided by your device.

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).
 - If you use a location-enabled browser, we may receive information about your location.
 - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
 - When you open and maintain a bank account and/or other financial services through use of the Services.
- **Public Records**
 - From the government or other sources.
- **Affiliates**
 - From our affiliates in countries other than the United States. Those affiliates may share all Personal Information they have about you with us.
- **Third Parties**
 - Payors

- When we interact with third parties that intend to send money to you or receive money from you.
- o Vendors
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - We may use vendors to obtain information to generate leads and create user profiles.
- o Advertising Partners
 - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
 - o Creating and managing your account or other user profiles.
 - o Opening and administering bank accounts, credit card accounts, and other financial products and services in your name or for your benefit.
 - o Processing orders or other transactions; billing.
 - o Providing you with the products, services or information you request.
 - o Meeting or fulfilling the reason you provided the information to us.
 - o Providing support and assistance for the Services.
 - o Improving the Services, including testing, research, internal analytics and product development.
 - o Personalizing the Services, website content and communications based on your preferences.
 - o Doing fraud protection, security and debugging.
 - o Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- **Marketing the Services**
 - o Marketing and selling the Services.
- **Corresponding with You**
 - o Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Coba or the Services.
 - o Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - o Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - o Protecting the rights, property or safety of you, Coba or another party.
 - o Enforcing any agreements with you.
 - o Responding to claims that any posting or other content violates third-party rights.
 - o Resolving disputes.

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

How We Share Your Personal Data

We do share your information with third parties as described in this Policy. We may share some of your information:

- With Partner Financial Institutions for the purposes of offering bank accounts and deposit services to you and providing customer service to you. You understand that these Partner Financial Institutions will have access to all Data and that their privacy policy shall apply.
- With the Partner Financial Institutions in order to provide banking services to you and to enable the cash management program and s to the extent required in order to comply with regulation, and bank's regulatory obligations and any applicable "know your customer" requirements. You understand that Partner Financial Institutions may have access to all Data and that the Partner Financial Institutions applicable data privacy policy or notice shall apply;
- With other Financial Services Partners to provide various financial products and services. You understand that these Financial Services Partners will have access to your Data and that the applicable data privacy policy or notice shall apply.
- For our everyday business purposes, such as processing your transactions, maintaining your account(s), or reporting to credit bureaus;
- With other companies that provide services to us, such as identity verification service providers, fraud prevention service providers, credit bureaus, or collection agencies;
- With other parties to transactions when you use the Services, such as other users, merchants, and their service providers. We may share your information with other parties involved in processing your transactions. This includes other users that you are sending or receiving funds from, and merchants and their service providers. This information might include: (i) information necessary to facilitate the transaction, and (ii) information to help other participant(s) resolve disputes and detect and prevent fraud;
- To information technology providers or other service providers around the world that act under our instructions regarding the processing of certain data ("**Vendors**"). Vendors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the information, and to process information only as instructed;
- To card networks if you are issued a card by the Participating Depository Institution. You understand that the card network may have access to all Data and that the card network applicable data privacy policy or notice shall apply;
- To independent external auditors or other service providers around the world. Such service providers will be subject to any necessary contractual obligations regarding the protection and processing of such Data;
- In connection with a change of ownership or control of all or part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
- To support our audit, compliance, and corporate governance functions;
- To service providers to prepare, deploy and analyze advertising content;
- For our everyday business purposes, such as processing your transactions and maintaining your account(s);
- To establish, exercise, or defend our legal rights, including providing information
- to others for the purposes of fraud prevention and risk management;
- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
- With your consent or direction.

In addition, we disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Governmental entities.** Various governmental entities may request or demand that we deliver your Personal Data to them or we may do so in compliance with applicable law.
- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security, identification verification, and fraud prevention consultants and service providers.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
 - Payment networks such as Visa and/or Mastercard.
 - Payment processors.
 - Our payment processing partners, which may include Plaid Inc. (“Plaid”), collect your voluntarily-provided payment card information necessary to process your payment.
 - Please see Plaid’s [Privacy Policy](#) for information on its use and storage of your Personal Data.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
 - Ad networks.
 - Data brokers.
 - Marketing providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
 - Companies that track how users found or were referred to the Services.
 - Companies that track how users interact with the Services.
- **Affiliates.**
 - We may share all Personal Information we have about you with our affiliates in other countries.
- **Business Partners.** These parties partner with us in offering various services. They include:
 - Banks where you have an account or that may hold funds in which you have a beneficial interest.
 - Auditors, examiners, and consultants.
 - Businesses that you have a relationship with.
 - Companies that we partner with to offer joint promotional offers or opportunities.
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the services.
 - Social media services.
 - Parties desiring to send money to you or receive money from you.
 - Persons to whom you desire to pay money or receive money from.
 - Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools and “Do Not Track”

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics [Terms of Service](#) and the Google [Privacy Policy](#). You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <http://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Data Security, Retention and Control Over Your Information

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

You always have the ability to control the way your information is used. Below are some ways to manage your information with Coba.

- **Updating your Information** - Once you have registered for an Account, you may be able to update or correct your profile information details and preferences by accessing your account settings through the Coba App, or by contacting us at [Customer Service Email] or write to us at: Coba, [Program Name Address]
- **Deactivating your Account** - We do not delete information about you upon deactivation of your Account. Although your deactivated status is reflected promptly in our user databases, we may retain the information you submit for a variety of purposes, including legal compliance, backups and archiving, prevention of fraud and abuse, and analytics. Upon deactivation, you will no longer receive emails from Coba and links to third-party financial accounts and services will automatically terminate. If you have a money transfer transaction pending at the time you deactivate your account, your link to this service from Coba will terminate but your pending transfer will continue to completion and your bank account will remain open.
- **Correcting Credit Reports** - Information related to your creditworthiness is maintained by the credit bureaus. If you find that there is an error or you want to dispute the information found in your credit report, please contact the credit reporting bureaus: [Experian](#), [Transunion](#), and [Equifax](#).
- **Opting-Out of Certain Online Ads** - To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you can visit the Digital Advertising Alliance (DAA) and/or the Network Advertising Initiative's (NAI) at www.aboutads.info/choices or <http://www.networkadvertising.org/choices/>. You may also be able to limit interest-based advertising through the settings menu on your mobile

device by selecting “limit ad tracking” (iOS) or “opt-out of interest-based ads” (Android). You may also be able to opt-out of some — but not all — interest-based advertising served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. Please note: When you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us. It means that the online ads that you see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA’s Principles.

- **GLBA-Covered Data** - Our [GLBA Privacy Notice](#) provides information about how you can limit your sharing options for our financial services and GLBA-covered data.

Applicable State Laws

Applicable state laws must be taken into consideration when marketing to customers via a third party. For example, Vermont and California state laws prohibit financial institutions from sharing customer PII unless the customer takes affirmative action authorizing the institution to do so. Therefore, customers with Vermont or California addresses must be removed from campaigns that involve information sharing with unaffiliated third parties under the Regulation P joint marketing agreement exception.

- California Consumer Privacy Act (CCPA) covers California residents about whom Coba has collected personal information (PI) from and is applicable to any business that collects and stores PII of California residents, regardless of if the business is located in California. For purposes of this section the term “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer/resident or household. Personal information does not include information that has been de-identified or that does not fall within the above definition of personal information.

Coba is a financial technology platform that enables individuals and businesses to access financial services through regulated partners. While Coba does not itself provide consumer financial products, Coba has developed and implemented privacy and security controls to protect your personal information and comply with United States federal law, including but not limited to the Gramm-Leach-Bliley Act and the Fair Credit Reporting Act. As such, most of the personal information about you that we may collect and use is exempt from the CCPA.

California Privacy Rights

Under the California Consumer Privacy Act, California residents, subject to certain limitations and exceptions, have the right to:

- Right to Know- The right to request the following information from us about our use of your personal information:
 - The specific pieces of personal information we have collected about you
 - The categories of personal information that we have collected about you
 - The categories of sources from which your personal information was collected

- The business or commercial purpose for collecting or selling your personal information
- The categories of third parties with whom we may share personal information
- Right to Delete - You have the right to request the deletion of your personal information that is collected or maintained by us.
- Right to Opt-Out of Sale - You have the right to opt-out of the sale of your personal information by us. We do not sell personal information.
- Right to Non-Discrimination - You have the right to not receive discriminatory treatment by us for the exercise of the privacy rights described above.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another customer or consumer or where the personal information that we maintain about you is not subject to your rights under the CCPA.

We will advise you in our response if we are unable to honor your request. Additionally, if you request access to the specific pieces of personal information we have collected about you, we will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, account passwords or security questions and answers, or any other specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft, fraud, or unreasonable risk to data, systems, and network security.

How to Exercise Your Rights under the CCPA

If you are a California resident, you may make a request to exercise your rights under the CCPA by either of the following methods:

- Submitting a request via email to support@coba.ai, or
 - Calling us at +1 (737) 260-0512.
- Children Online Privacy Protection Act (COPPA) is a federal law that imposes specific requirements on operators of websites and online services to protect the privacy of children under 13. It is Coba's policy NOT to (i) sell any customer or consumer PII to third parties, and (ii) collect PII from individuals under the age of 13, as defined by COPPA (Children Online Privacy Protection Act), and under the age of 16 (per the CCPA). The Coba App is not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you believe that a child under age 13 may have provided us with personal information without parental consent, please contact us.
 - Vermont State Law - Coba does not share information of customers with a Vermont address with affiliated companies.
 - Privacy and Opt-Out Notice - Our customers provide private information to Coba during daily business, and we are committed to treating such information responsibly. Our customers expect privacy and security for their banking and financial affairs. To that end, we provide the Privacy and Opt-Out Notice (Notice) to all consumers at account opening,

enrollment for a new service, if there are changes to our privacy practices, and annually thereafter, if required by law.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Coba website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Reporting Unauthorized Disclosure of Personal Information

The trust of our customers is Coba's most valuable asset. When an unauthorized disclosure of PII occurs, how Coba responds and communicates to customers and regulatory agencies can be the difference between a potential compliance penalty or action lawsuit and an opportunity to reinforce our commitment to care.

The negative impact of an information breach can create reputational risk and cause noncompliance with laws and regulations. Incidents may include any situation in which customer personal, financial or health information or records (whether in paper, electronic, or other form that is maintained by or on behalf of Coba) may potentially be lost, misdirected, or in any way accessed by unauthorized individuals or parties. Any incidents or suspected incidents involving data security and disclosure of customer information should be reported immediately to the IT Department and/or Senior Management in accordance with the Information Security Policy's standards and associated procedures. Coba's unaffiliated third-party service providers are instructed to report all unauthorized access to, and disclosure of, any customer information.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- WhatsApp: +1-737-260-0512
- Phone: 1-888-315-2622 or +1-737-260-0512
- www.coba.ai
- support@coba.ai
- 1606 Headway Cir STE 9049, Austin, TX 78754