

# Privacy Policy

Effective date: 06/01/2018

We at Final know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Online Privacy Policy. The Online Privacy Policy governs information we collect through our Services, as detailed below. Information collected in connection with your Final credit card is also subject to our Privacy Notice.

**By using or accessing** our website(s) and mobile application(s) (“our Services”) **in any manner, you acknowledge that you accept the practices and policies outlined in this Online Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways. This Online Privacy Policy, or its future variation, will continue to apply if your use of our Services is discontinued by either you or us.**

Remember that your use of our Services is at all times subject to the [Terms of Use](#), which incorporates this online Privacy Policy. Any terms we use in this Policy without defining them may be defined in the [Terms of Use](#).

## What does this Online Privacy Policy cover?

This Online Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services. Examples of Personal Information, include, but are not limited to: name, address, phone number, email address, social security number, income, Internet Service Provider (IP) address, and device type. The Online Privacy Policy does not apply to the practices of companies we don't own or control, or people that we don't manage.

We gather various types of Personal Information from our users, as explained in more detail below. We use this Personal Information internally in connection with our Services:

- to personalize, provide, and improve our services,
- to allow you to set up a user account and profile,
- to contact you and allow other users to contact you
- to fulfill your requests for certain products and services, and
- to analyze how you use our Services.

In certain cases, we may also share some Personal Information with third parties, but only as described below.

As noted in the [Terms of Use](#), we do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [support@spend.com](mailto:support@spend.com).

# Will we ever change this Online Privacy Policy?

We're constantly trying to improve our Services, so we may need to change this Online Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on [www.spend.com](http://www.spend.com), 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 our Services, and you are still responsible for reading and understanding them. If you use our Services after any changes to the Online Privacy Policy have been posted, you agree to all of the changes. Use of information we collect now is subject to the Online Privacy Policy in effect at the time such information is collected.

## What information do we collect?

**Information You Provide to Us.** We receive and store any information you knowingly provide to us. For example, you will provide information if you apply for credit online, such as by providing a social security number and your income. You may also provide information through the registration process or save information on your device or account settings such as your name, email address, and phone number. Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of our Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us improve our services. If you do not want to receive communications from us, please indicate your preference by [support@spend.com](mailto:support@spend.com).

**Information Collected Automatically.** Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, identification of your device, "cookie" information, the type of browser and/or device you're using to access our Services, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features.

Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on our Services. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Online Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve our Services – for example, this data can tell us how often users use a particular feature of our Services.

## Information collected from other websites and our Do Not Track Policy.

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve our Services and customize your online experience, and otherwise as described in this Online Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using our Services and after you leave our Services.

## Information shared on social media sites.

We provide experiences on social media platforms including, but not limited to, Facebook®, Twitter®, YouTube® and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. Any content you post on social media pages managed by us, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and privacy policies of those respective platforms. Please refer to their policies to better understand your rights and obligations with regard to such content.

## Will we share any of the Personal Information we receive?

We may share your Personal Information with third parties as described in this section:

**Information that's no longer personally identifiable.** We may anonymize your Personal Information so that you are not individually identified, and provide that information to our partners. We may also provide aggregate usage information to our partners, who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage information to a partner in a manner that would identify you personally, as an individual.

**Advertisers.** We allow advertisers and/or merchant partners ("Advertisers") to choose the demographic information of users who will see their advertisements and/or promotional offers and you

agree that we may provide any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for San Francisco businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in aggregate form, and not in a manner that would identify you personally. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

We may deliver a file to you through our Services (known as a “web beacon”) from an ad network. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their site. You may be able to opt-out of web beacon tracking conducted by third parties through our Services by adjusting the Do Not Track settings on your browser; please note that we don’t control whether or how these third parties comply with Do Not Track requests.

**Service Providers.** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our service providers do not have any right to use the

Personal Information we share with them beyond what is necessary to assist us.

**User Profiles and Submissions.** Certain user profile information, including your name, location, and any video or image content that such user has uploaded to our Services, may be displayed to other users to facilitate user interaction within our Services or address your request for our services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others. Please remember that any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone. Your user name may also be displayed to other users if and when you send messages or comments or upload images or videos through our Services and other users can contact you through messages and comments.

**Business Transfers.** We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

**Our Protection or Protection of Others.** We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with law or court order; enforce or apply our [Terms of Use](#) and other agreements; protect our rights, property, safety, employees, and users; or protect others.

# Is Personal Information about you secure?

Your account, whether accessed by computer or a mobile device, is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device by signing off after you have finished accessing your account. By using our Services, you agree to notify us immediately if an unauthorized party accesses or uses your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

# What Personal Information can You access?

Through your account settings, you may access, and, in some cases, edit or delete the information you've provided to us.

The information you can view, update, and delete may change as our Services change. If you have any questions about viewing or

updating information we have on file about you, please contact us at [support@spend.com](mailto:support@spend.com).

## What choices do you have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by contact support at [support@spend.com](mailto:support@spend.com). Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

## What if you have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to support at [support@spend.com](mailto:support@spend.com), and we will try to resolve your concerns.