

# Varo Bank U.S. Online & Mobile Privacy Policy

Varo Bank is committed to your privacy. Our goal is to maintain your trust and confidence when handling personal and financial information about you.

This U.S. Online & Mobile Privacy Policy (“Policy”) describes Varo Bank’s online and mobile privacy practices and applies to anyone who visits our websites or Varo Bank branded social media sites or pages, or uses our mobile applications. The term “Varo Bank” or “we” or “us” or “our” in this Statement means U.S. affiliates or subsidiaries of Varo Bank linking to this Statement.

**Information that you provide to Varo Bank when you apply for or obtain a product or service from us to be used primarily for personal, family or household purposes is also governed by a separate notice entitled ‘Varo Bank Privacy Notice’. If you are such an applicant or customer, please refer to that notice for additional information about our privacy practices.**

By using this website or our mobile applications, you agree to the terms and conditions of this Statement.

## Information We Collect

When you use our website or our mobile applications, we may collect data from you that generally fall into one of two categories:

**“Personal Information”** - Personally identifiable information you provide to us such as your name, mailing address, email address, telephone or wireless phone number, social security number (used for identification purposes), or other information that identifies you.

Personal Non-Identifying information can include information such as city or state of residence, age, industry, demographic profile or other non-identifying characteristics.

**“Online/Mobile Activity Data”** - Data such as your IP address, your browser type and language, and your display/screen settings; data about how you use our website and how you interact with our website and mobile advertisements; data about your mobile device; advertising identifiers; geolocation data; social media preferences and other social media data; and other data that may be aggregated and/or de-identified (information that doesn’t identify individual consumers/customers).

## How We Collect Information

### *When You Use or Visit Our Website*

Varo Bank may collect information about you when you browse our website or use our online services. We may collect Personal Information when you voluntarily provide it to us through forms on our website or in our mobile applications, such as survey forms,

bank account or loan applications, contest entries, and login pages for online banking or mobile application access.

Varo Bank may also use cookies and other online tracking devices such as pixel tags and clear GIFs (also known as web beacons) to collect Online/Mobile Activity Data from you depending on your browser settings. Cookies are small text files that a website's server places on your computer. Cookies provide a means for websites that you visit to track browsing activities conducted with your computer. A Web beacon is a small string of software code that represents a graphic image on a website or email.

Varo Bank may also partner with certain third parties to deliver advertisements and monitor activities on our own website and other websites. Our partners may use cookies, web beacons, and/or other monitoring technologies to compile statistics about website visitors.

#### *When You Use Our Mobile Apps*

Additionally, Varo Bank may collect Online/Mobile Activity Data when you access our mobile applications or use the browser on your mobile device to access our website. For example, if you have enabled location services on your mobile device, we may collect geolocation data from your device.

#### *When You Use Our Social Media Pages*

Varo Bank has official pages on social media websites such as Facebook®, Twitter® and LinkedIn that enable consumers and customers to discuss their experiences with Varo Bank products and services.

We may also partner with companies that operate social media websites through which you may engage with Varo Bank

When you interact with us on social media websites we may collect information such as your likes, interests, feedback and preferences. When you interact with our partners, you are subject to their terms of use and privacy policies.

We may collect information from our social media partners, but only if you choose to share with them and they, in turn, share such information with us. **Never include sensitive personal, financial or other confidential information such as your Social Security number, account number, phone number, mailing address or email address when posting or commenting online. Any posts you make on our official social media pages -- including posts that contain pictures, comments, suggestions, opinions, complaints or Personal Information -- are available to others who use those pages and are subject to the terms of use and privacy policies of the companies that operate the websites on which they appear.** Please refer to the policies of those companies to better understand your rights and obligations with regard to such posts. You are also subject to this Statement and our social media guidelines when you visit our official social media pages.

## **How We Use Information**

We may use Personal Information and Online/Mobile Activity Data we have collected for a variety of reasons. For example, we may use this type of data:

- to enable you to apply for and open Varo Bank products or services
- to verify your identity (such as when you access your account information)
- to prevent fraud and enhance the security of your account or our online services
- to enable you to use online tools or perform certain online transactions
- to service and manage your accounts including responding or updating you on inquiries or to contact you about your accounts
- to provide you tailored content and marketing messages
- to operate, evaluate and improve our business (including developing new products and services; improving existing product and services; performing data analytics; and performing accounting, auditing and other internal functions)
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements
- for other purposes that we may specifically disclose at the time you provide or we collect your information.

## **Updating Your Information**

Keeping your account information up-to-date is very important. You may review, or update certain account information by logging into your account online. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the Contact Us option on our site, or call or write to us using the contact information listed on your account statements, records, or other account materials.

## **Protecting Children's Online Privacy**

Varo Bank encourages protection of children's information on the internet. We do not intentionally collect personal information from children under 13 on our website without first obtaining consent from their parents or legal guardians. For more information about the Children's Online Privacy Protection Act (COPPA) please refer to the FTC's website at <http://www.business.ftc.gov/privacy-and-security/children%27s-privacy>.

**Links**

Our website may include links to third-party websites. These third parties are not subject to this Statement or to the Varo Bank Privacy Notice. Whenever you visit a third-party website, you should review its privacy notice.

**Information Security**

At Varo Bank, we make your safety and security a top priority and are committed to protecting your personal and financial information. If we collect identifying information from you, we will protect that information with controls based upon internationally recognized security standards, regulations, and industry-based best practices.

Varo Bank maintains customer authentication procedures to protect your personal information and account from identity theft. These procedures are for your protection. If you suspect a website is pretending to be a Varo Bank website (also known as “spoofing”) do not enter personal information but instead contact us through a phone number you know is associated with your account at Varo Bank, or by emailing [privacy@varomoney.com](mailto:privacy@varomoney.com).

**Changes to this Statement**

This Statement describes Varo Bank’s current online privacy practices. Varo Bank may change its online privacy practices in the future and we may revise this Statement to reflect material changes. This Statement was last revised July 1st 2020, and is effective as of that date.