

bAI

Privacy Policy

At bAI, we take privacy and security seriously. This Privacy Policy outlines how bAI Financial LLC. and its affiliates (collectively, “bAI,” “we,” “our,” or “us”) process the information we collect about you through our websites, mobile apps, and other online services (collectively, the “Services”) and when you otherwise interact with us, such as through our customer service channels.

Specific sections of this Privacy Policy include:

1. INFORMATION WE COLLECT AND HOW WE COLLECT IT
2. HOW WE USE YOUR INFORMATION
3. DISCLOSURES OF INFORMATION
4. THIRD-PARTY TRACKING AND ONLINE ADVERTISING
5. DO NOT TRACK
6. YOUR CONTROLS
7. NOTICE TO CALIFORNIA AND VIRGINIA RESIDENTS
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1. INFORMATION WE COLLECT AND HOW WE COLLECT IT.

Information You Provide

We collect information you provide when you use our Services or otherwise engage or communicate with us as described below.

- **Identity Data**, such as your name, date of birth, marital status, social security number, biometric identifiers, and other data on government-issued identification documents;
- **Contact Data**, such as your email address, mailing address, and telephone number;
- **Financial Data**, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;
- **Profile Data**, such as your username and password, your knowledge assessment results, your interests, preferences, feedback, and survey responses;
- **Stored Content**, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission; and
- **Additional Data You Provide**, such as via focus groups, survey responses, contests/ sweepstakes, customer support, data you provide in memos when using our Pay & Request Service, or other means.

- **Information you provide us when using our Pay & Request Service: Pay & Request Recipient Contact Information:** In order to conduct a money transfer using our Pay & Request payment Service, we collect information (including the name and an email address or phone number) from you about the intended recipient of the payment you request us to make.
- **Other Information You Provide:** We collect additional personal information that you choose to provide to us, including your contact list information and photographs. If you do choose to upload your photograph to our Service, please note that all images must adhere to our App Use Standards which you are required to comply with to use any of the bAI's Services.

Information We Collect Automatically

As is true of many digital platforms, we also collect certain information about you automatically when you use our Services, as described below.

- **Usage Information.** We collect information about your activity on our Services, which includes device identifiers (like IP address or mobile device identifiers), pages or features you use, time and date of access, and other similar usage information.
- **Transactional Information.** When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as transaction amount, type and nature of the transaction, and time and date of the transaction.
- **Location Data.** We may collect the GPS location of your mobile device in accordance with your device permissions. You can stop the collection of this precise location information at any time (see the Your Control section below for details). Google uses technologies to approximate your location, including IP address (see Google's Privacy Policy at <https://policies.google.com/privacy> to learn more about how they process this information). We also approximate your location by your IP address.
- **Information Collected Through Tracking Technologies.** We and our service providers also use technologies, including cookies and web beacons, to automatically collect certain types of usage and device information when you use our Services or interact with our emails. The information collected through these technologies includes your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique device or account ID, usage information and other similar information. For information about how to disable cookies, please see the Your Controls section below.

Information We Collect from Other Sources

We also obtain information about you from other sources as described below.

- **Vendors and Business Partners.** We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, as well as inferred fraud risk, from identity verification and fraud prevention partners.

- **Financial Account Linking.** bAI offers account linking and aggregation services through various payment processing service providers. By utilizing these services, you acknowledge and agree to the terms of our payment processing provider's policies. Further, you grant the right, power, and authority to access and transmit your information as reasonably necessary to provide payment processing services. To the extent you previously utilized account linking and aggregation services through bAI's previous service providers, you expressly authorize those providers to transmit any information or data arising from those services so that our current payment processing service providers can provide their services.
- **Connected Services.** If you link, connect, or log in to your bAI Account with a third-party service (e.g., Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Publicly Available Data.** includes contact information, your interactions with our social media platforms, and other information from publicly available sources, such as public websites.
- **Advertising Data.** We collect information in connection with our ad campaigns that surfaced on other platforms, such as the ads you clicked on and other interactions with our ads.
- **Data from other users.** If you are in another user's contact list and they choose to share that list with us, then we will collect the contact information and your association with that user.

2. HOW WE USE YOUR INFORMATION.

We use the information we collect for purposes described below or as otherwise described to you at the point of collection:

- **Maintain and provide the Services,** including processing account applications, authenticating your identity, repairing our Services, support, process and recording transactional information, and handling billing and account management;
- **Send you transactional or relationship information,** including confirmations, invoices, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
- **Communicate with you about offers and other things we think you will be interested in,** such as newsletters, product announcements, partner offerings, surveys, contests or sweepstakes, events or announcements;
- **Personalize our Services,** such as by suggesting content or customizing content or ads we show you;
- **Monitor and improve our Services,** including analyzing usage, research and development;
- **Facilitate contests, sweepstakes, and promotions** and process and deliver entries and rewards;

- **Help protect the safety and security of our Services, business, and users**, such as to investigate and help prevent fraud or other unlawful activity;
- **Protect or exercise our legal rights or defend against legal claims**, including enforcing and carrying out contracts and agreements; and
- **Comply with applicable laws and legal obligations**, such as compliance obligations associated with being a regulated broker-dealer and compliance obligations associated with being a money services business.

3. DISCLOSURES OF INFORMATION.

We are committed to maintaining your trust, and we want you to understand when and with whom we share information about you. We share information about you in the instances described below.

- **Authorized third-party vendors and service providers.** We share information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, and analytics services. We use an identification verification service provider to determine whether a selfie you take matches the photo in your government-issued identification. With your consent, we may record your voice and send this data to our third-party partner to authenticate you and to help prevent fraud. The information collected from your photo and your voice by our third-party vendors may include biometric data.
- **Companies in which you hold securities.** bAI may provide your name, address, email address, and securities positions to requesting companies in which you hold securities.
- **bAI affiliates.** Where appropriate, we share information about you with other companies owned or controlled by bAI. For example, bAI Financial LLC. may receive information to provide you with custody and other related services as described in your customer agreement. These companies will process any information shared in the same manner as described under this Privacy Policy.
- **Substantial corporate transactions.** We may share information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, financing, change in control, or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.
- **Legal purposes.** We disclose information about you if we believe that disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of bAI, our users, or the public.
- **With your consent.** We share information about you for any other purposes disclosed to you with your consent.
- **With users of our other Services.** We may disclose information about you with users of our other Services, such as our Pay & Request Services, for which you may not have yet enrolled. In such cases, we will share your Pay & Request profile which includes: your profile picture, username, full name, the year you joined, and the transaction history

between you and the person viewing it, with other bAI users. For payments and requests, this helps others know they're getting money from you (or that you requested a payment from them). Your Pay & Request profile will be visible to anyone on bAI unless you adjust your profile visibility settings. You may opt-out of Pay & Request profile visibility at any time.

We share information with others in an aggregated or otherwise de-identified form that does not reasonably identify you.

4. THIRD-PARTY TRACKING AND ONLINE ADVERTISING.

We use third-party advertising and analytics services to better understand your online activity and serve you targeted advertisements. For example, we use Google Analytics and you can review the "How Google uses information from sites or apps that use our services" linked here: <http://www.google.com/policies/privacy/partners/> for information about how Google processes the information it collects. These companies collect information about your use of our Services and other websites and online services over time through cookies, device identifiers, or other tracking technologies. The information collected includes your IP address, web browser, mobile network information, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver advertisements targeted to your interests on our Services and other platforms, as well as to provide advertising-related services to us such as reporting, attribution, analytics, and market research.

For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices. You should also review your mobile device settings and controls for features that allow you to opt-out or opt into having certain information collected for behavioral advertising purposes. Please note, as a self-directed broker-dealer, we do not advertise on behalf of specific securities or investment options on our Services.

5. DO NOT TRACK.

Some web browsers transmit "do-not-track" signals to websites. We currently don't take action in response to these signals.

6. YOUR CONTROLS.

Account profile. You can update certain account profile information by logging into your account. For example, you may choose to upload a photograph of yourself but are not required to in order to use our services. You may also choose to update your username. Please note that any changes you make to your account profile must be in accordance with our App Use Standards.

Profile visibility. Your Pay & Request profile will be visible to anyone on bAI unless you adjust your profile visibility settings. You may opt-out of Pay & Request profile visibility at any time.

Access to your device data. You may disconnect our mobile app's access to certain stored device information through your device's settings. For instance, you can withdraw permission from the app to access your contact list or photo gallery.

How to control your communications preferences. You can stop receiving promotional emails from us by clicking the “unsubscribe” link in those emails. We may still send you service-related or other non-promotional communications, such as account notifications, receipts, security notices, and other transactional or relationship messages.

Affiliate sharing opt-out. In some cases, you can limit sharing between bAI affiliates. If you want to exercise this right, please contact us at contact@bai.us.

Disabling certain data sharing. You can limit how we share your data with our marketing partners to more effectively market our Services to you across sites and apps. When disabled, we will no longer share personal information with these partners for these purposes.

Cookie controls. Many web browsers are set to accept cookies and similar tracking technologies by default. If you prefer, you can set your browser to delete or reject these technologies. If you choose to delete or reject these technologies, this could affect certain features of our Services. If you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again.

7. NOTICE TO CALIFORNIA AND VIRGINIA RESIDENTS.

This section provides additional details about the personal information we collect about California and Virginia residents and the rights afforded to them under the California Consumer Privacy Act (“CCPA”) and the Virginia Consumer Data Protection Act (“VCDPA”). Please note that the CCPA does not apply to what is referred to as nonpublic personal information collected by financial institutions (like bAI), as that information is subject to other financial privacy laws. Additionally, the VCDPA does not apply to any bAI entities that are financial institutions. As a result, the CCPA and VCDPA do not apply to most of the information that bAI collects.

Subject to certain limitations and exceptions, the CCPA and VCDPA provide California and Virginia residents, respectively, with certain rights. Depending on the state in which you are a resident, you may have the right to:

- Confirm whether bAI processes your personal information;
- Correct inaccurate personal information;
- Request details (in a readily usable format) about the categories and specific elements of personal information we collect;
- Delete your personal information;
- Opt out of any sales, sharing, targeted advertising, or profiling for certain decisions (as these terms are defined in the CCPA and/or VCDPA); and
- Not be discriminated against for exercising these rights.

We do not sell information about you to third parties. In order to help bAI deliver advertising and marketing on other platforms, we do allow third parties to collect information through our Services. Please see the “Third-Party Tracking and Online Advertising” section above for more details, including choices available to you.

We collect the following categories of personal information: identifiers (such as name, email address, and IP address), Internet or other electronic network activity information (such as engagement with promotional messages and ads), and inferences (such as gender, based on your first name). For California residents, the preceding list reflects bAI's processing in the past 12 months. For more details about the information we collect (including the categories of sources of this information) as well as the purposes for processing, please see the "Information We Collect and How We Collect It" section above. We share this information with the categories of third parties described in the "Disclosures of Information" section above.

California and Virginia residents may make a request to exercise rights under the CCPA and VCDPA, respectively, that are not otherwise exempt under applicable law. If you are a bAI app user, a request may be made by logging into your bAI account, navigating to the Security and Privacy menu, and selecting the option to either Download Personal Data or Request Data Deletion. You may also request assistance by sending an email to contact@bai.us. We may verify the request by asking you to provide information that matches the information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly. If you are a Virginia resident and bAI is unable to satisfy your request to exercise a right available to you under the VCDPA, you are entitled to appeal our decision by emailing contact@bai.us.

8. NOTICE TO NEVADA RESIDENTS.

We do not sell consumers' covered information for monetary consideration (as defined in Chapter 603A of the Nevada Revised Statutes). However, if you are a Nevada resident, you have the right to submit a request directing us not to sell your personal information. To submit such a request, please contact us using the contact details in "HOW TO CONTACT US" below.

9. CHILDREN.

We do not knowingly collect or solicit any information from anyone under the age of 13 on these Services. In the event we learn that we have inadvertently collected personal information from a child under age 13, we will take reasonable steps to delete that information. If you believe that we might have any information from a child under 13, please contact us at contact@bai.us.

10. TRANSFER OF INFORMATION.

Our Services are currently designed for international use. If you are using our Services from another jurisdiction, your information may be processed in the United States or other countries that may not provide levels of data protection that are equivalent to those of your home jurisdiction.

11. CHANGES TO THIS POLICY.

This Privacy Policy will evolve with time, and when we update it, we will revise the "Effective Date" above and post the new Policy and, in some cases, we provide additional notice (such as adding a statement to our website or sending you a notification). To stay informed of our privacy practices, we recommend you review the Policy on a regular basis as you continue to use our Services.

12. HOW TO CONTACT US.

If you have any questions about this Privacy Policy, please contact us at contact@bai.us.