

## California Consumer Privacy Act (CCPA) Notice

### Rights for California Residents

This California Consumer Privacy Act (“CCPA”) Notice (“CCPA Notice”), included as part of the ZYNLO Privacy Policy, applies solely to consumers residing in the State of California (“you”).

This Notice will explain how ZYNLO (“we” or “us”) collects, uses and discloses personal information about California residents. This CCPA Notice will also explain certain rights that California residents have under the CCPA.

“Personal information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with you or your household. “Personal information” does not include: a) publicly available information which is lawfully made available from federal, state or local government records, or b) de-identified or aggregate consumer information.

Important Note: Nothing in this CCPA Notice shall apply to any of your personal information collected, processed or disclosed by us pursuant to the federal Gramm-Leach-Bliley Act, including: a) any personal information provided by you to obtain a financial product or service from us; b) any personal information resulting from any transaction involving a financial product or service between you and us; or c) any personal information we obtain about you in connection with providing a financial product or service to you.

#### 1. Collection of Personal Information

We may collect (and may have collected during the prior twelve (12) months) the following categories of personal information about you:

- a. Personal identifiers, including those listed in other California statutes: Real name; alias; Social Security number; passport number; other government issued number; Green Card number; driving license number; telephone number; email address; postal address; account name; online identifier; device identifier; IP address
- b. Characteristics of protected classifications: date of birth/age; gender; military or veteran status; marital status; nationality; citizenship
- c. Biometric information: fingerprint; voice recordings
- d. Professional or Employment: title; occupation
- e. Education information: n/a
- f. Financial details: bank account numbers; debit/credit card numbers; cardholder or accountholder name and details; transaction details

- g. Commercial Information: records of personal property; products and service purchased, obtained or considered; purchasing or consuming histories or tendencies
  - h. Internet or other electronic network activity information: browsing history, search history, information regarding your interaction with a website, application or advertisement
  - i. Geolocation data: any information used to identify your physical location
  - j. Communications, recordings, images: audio, electronic, visual
  - k. Inferences: Any derivation of information, data, assumptions, or conclusions drawn from any of the above categories used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
2. Use of Personal Information

We may use (and may have used during the prior 12 months) any personal information we have collected regarding you for the following business and commercial purposes:

- a. Marketing/Prospecting: communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate
- b. Operation of our Sites: operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites
- c. IT operations: management of our communications systems; operation of IT security; and IT security audits
- d. Research: conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services
- e. Security: electronic security (including login records and access details, where you access our electronic systems)
- f. Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law
- g. Legal compliance: compliance with our legal and regulatory obligations under applicable law

- h. Legal proceedings: establishing, exercising and defending legal rights
- i. Improving our products and services: identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services
- j. Risk Management: Audit, compliance, controls and other risk management
- k. Fraud prevention: Detecting, preventing and investigating fraud

### 3. Sources of Personal Information

We may obtain (and may have obtained during the prior twelve (12) months) personal information about you from the following categories of sources:

- a. Directly from you (e.g., when you apply for an account, or when you contact us via email or telephone, or by any other means).
- b. Personal information you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- c. ZYNLO's affiliates and subsidiaries does not obtain information from affiliates and subsidiaries.
- d. Third parties who provide your personal information to us, to the extent permitted under applicable law (e.g., our service providers, other financial institutions (such as when you link an external bank account to a ZYNLO account, credit reporting agencies, payment processors and law enforcement authorities).
- e. When you visit any of our websites or mobile applications ("Site"), or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information).

### 4. Sharing of Personal Information

We may share (and may have shared during the prior twelve (12) month period) your personal information with the following categories of third parties for business purposes:

- a. You and, where appropriate, your representatives.
- b. Anti-fraud services.

- c. ZYNLO's accountants, auditors, financial advisors, lawyers and other outside professional advisors, subject to appropriate confidentiality obligations.
- d. Data aggregation services.
- e. Third party service providers (such as payment services providers, customer service providers, marketing companies, shipping companies, etc.)
- f. Governmental, legal, regulatory, or other similar authorities and/or local government agencies, where authorized or required by applicable law.
- g. Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.
- h. Any relevant third-party acquirer(s) of ZYNLO, in the event that ZYNLO sells or transfers all or any relevant portion of its business or assets (including in the event of a reorganization, dissolution or liquidation).

#### 5. Sale of Personal Information

We do not sell personal information.

#### 6. Right to Know About Personal Information Collected, Disclosed or Sold

You have the right to request, no more than twice in a twelve (12) month period, that we disclose to you the following information about the personal information that we collect, use, disclose and sell about you:

- a. The categories of personal information that we have collected about you.
- b. The categories of sources from which we have collected your personal information.
- c. The business or commercial purposes for which we have collected your personal information.
- d. The categories of third parties with whom we have shared your personal information.
- e. The categories of personal information that we have disclosed about you for a business purpose.

- f. The specific pieces of personal information that we have collected about you.

However, we will not disclose to you certain information, such as your social security number, driver's license number (or other government-issued identification number), financial account number, any health insurance or medical identification number, account passwords, security questions and answers or unique biometric data generated from measurements or technical analysis of human characteristics.

As noted above, we do not sell personal information.

## 7. Right to Delete Your Personal Information

You have the right to request that we delete certain personal information that we have collected about you, subject to certain exceptions.

These exceptions from your right to request deletion of your personal information include, but are not limited to, personal information necessary to:

- a. Complete the transaction for which the personal information was collected.
- b. Detect security incidents or protect against fraud.
- c. Debugging to identify and repair errors that impair existing functionality.
- d. Comply with a legal obligation.

## 8. Right to Non-Discrimination

We cannot discriminate against you because of your exercise of any of the privacy rights conferred to you under the CCPA and described in this CCPA Notice.

We may, however, charge you a different price or rate, or provide a different level of quality of goods or services to you, if such difference is reasonably related to the value provided to us by your personal information.

#### 9. How to Exercise Your Rights

You may exercise any of the rights listed above by:

- Sending an email to [Support@zynlobank.com](mailto:Support@zynlobank.com)
- Calling 1-844-996-5622

When you contact us to exercise any of the rights listed above, we will take reasonable steps to verify your identity prior to processing your request. We may require you to provide any of the following information associated with your ZYNLO account: your name, your physical address, your date of birth, your social security number, your email address, information regarding one or more recent transactions on your ZYNLO account and the last four digits of your ZYNLO debit card.

If we cannot verify your identity using reasonable means, we will not process your request.

If you do not have a ZYNLO account, send an email to [support@zynlobank.com](mailto:support@zynlobank.com) or call the toll-free number 1-844-996-5622.

Once we receive your request, we will attempt to respond to your request within 45 days of receiving your request, beginning on the day we receive your request. However, if we are unable to respond to your request within such 45-day period, we may extend our time to respond an additional 45 days (in other words, we may take up to 90 days to respond to your request, beginning on the day we receive your request).

If we must extend our time to respond to your request beyond the initial 45-day period, we will provide you notice of the extension and an explanation of the reason why we require more time to respond.

#### 10. Authorized Agents

You may designate an authorized agent to exercise any of the rights listed above on your behalf. An “authorized agent” is an individual or a business registered with the California Secretary of State to conduct business in California that you have authorized to act on your behalf.

If you designate an authorized agent, we may require the authorized agent to provide us proof that you gave the authorized agent signed permission to exercise your rights. We may still require you to verify your identity directly with us if you designate an authorized agent.

We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

#### 11. Contact for More Information

If you have questions or concerns about this CCPA Notice, please contact: 1-844-996-5622

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