



Privacy Policy

Zero Financial, Inc. (referred to as "Zero," "us," "our," or "we"), d/b/a Level, values your privacy. This Privacy Policy ("Policy") explains Zero's privacy practices when you use the Level website and the Level mobile application (individually and collectively the "Site"). This Policy includes the [Federal Privacy Notice](#) which covers how we treat your information that we may receive or collect about you.

By using the Site, you certify that you have reached the age of majority in the state of your residence, that you are a U.S. resident or citizen, and that you are not using this Site for your or your employer's commercial purposes, and you agree to this Policy.

We reserve the right to change this Policy from time to time with or without notice to you. You acknowledge and agree that it is your responsibility to review the Policy. Your continued use of this Site and any offerings made available on the Site after a change is posted, including but not limited to use of Zero products, will constitute acknowledgement and acceptance of the then-published Policy.

For purposes of the Policy, Zero refers to Zero Financial, Inc. and its owners, licensees, assigns, subsidiaries, affiliated companies, officers, directors, employees, sponsors, and third-party vendors and includes (without limitation) all parties involved in creating, producing, and/or delivering this Site and/or content and offerings available on this Site.

Zero partners with Evolve Bank & Trust to offer you financial products and services. If you obtain a checking account through Zero, please refer to the [Evolve Bank & Trust Privacy Notice](#). Please refer to the applicable privacy notice for additional information regarding how we collect, use, and disclose information in connection with your Zero account(s).

BY ACCESSING THIS SITE OR USING PRODUCTS OFFERED THROUGH ZERO, YOU GIVE YOUR CONSENT THAT ALL PERSONAL INFORMATION MAY BE PROCESSED BY US IN THE MANNER AND FOR THE PURPOSES DESCRIBED BELOW, AND YOU AGREE TO THIS POLICY. IF YOU DO NOT AGREE TO THIS POLICY, DO NOT ACCESS THE SITE OR USE PRODUCTS OFFERED THROUGH ZERO.

Types of Information We Collect

We collect any information that you provide to us on the Site or through your access to or use of the Site. This includes, but is not limited, to:

- Information you provide to join a waitlist, such as your name and e-mail address;
 - Information you provide to apply for Zero and Level branded products offered by our bank partner, such as your Social Security number or income information;
 - Information about your use of Zero or Level branded products offered by our bank partner, such as your transaction history;
 - Browsing information, such as where you click on the Site, the website or Uniform Resource Locator ("URL") that may have directed you to the Site or that you just came from, or the URL that you go to after visiting the Site;
- Device information, such as your browser type, operating system, or device type; and
- Location information, which may be derived from your IP address or other device information.

To the extent you elect to use Plaid, Inc. ("Plaid") through this Site to connect your personal and financial information, you understand and acknowledge that:

Zero uses Plaid Inc. ("Plaid") to gather End User's data from financial institutions. By using our service, you grant Zero and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#).

Your information collected through the Site may be combined with other information we collect about you from third-party sources.

How We Collect Information

We collect information when you voluntarily provide it to us. For example, if you elect to provide your name or e-mail address or both to join a Zero or Level waitlist or be notified of an upcoming product launch, we will collect that information. We also collect information when we process your application or service your account in connection with products offered through Zero and Level. Additionally, we also collect information through your phone or mobile device. Further, we collect information provided by third parties, including third parties that provide services for us, such as credit reporting agencies, data providers, and identity verification and fraud detection service providers.

Information may be collected using tools such as cookies. A cookie is a small data text file which is stored on your computer that uniquely identifies your browser. Cookies may include personalized information, such as your IP address, browser type, the server your computer is connected to, or the area code and ZIP code associated with your server. Most browsers are initially set up to accept cookies, but many browsers allow you to refuse some or all cookies or to indicate when a cookie is being sent. Some aspects of the Site may not function properly if you elect to disable cookies.

We may also collect information about you when you interact with Zero and/or Level on social media websites or third-party websites. These websites include, but are not limited to, Facebook and Twitter. Your use of social media and third-party websites, and the information shared with us by such websites, is subject to those websites' privacy policies, terms of use, and settings for privacy and advertising. WE WILL NEVER REQUEST ANY OF YOUR PERSONAL FINANCIAL INFORMATION ON ANY SOCIAL MEDIA WEBSITE. If you are asked for personal financial information on a third-party website, such as bank account information or your Social Security number, we recommend that you DO NOT provide it.

How We Use Information

We will primarily use the information we collect to provide product or service offerings to you as they become available. We may also use the information we collect for any other legitimate business purpose. For example, we may use the information we collect:

- To respond to your requests or questions;
- To provide you with the products or services that you request;
- To inform you of products or services that we think may be of interest to you;
- To enhance Site operations;
- To improve marketing or promotional efforts;
- To better understand the interests of Site visitors to design products or services;
- To analyze Site use and observe your behavior and browsing activities over multiple websites and platforms;
- To customize Site content, layout, and services;
- To recognize authorized devices;
- To prevent fraud;
- To enforce our agreements;

- For any other purpose for which you provide consent; or
- As otherwise permitted or required by law.

Aggregate or anonymous data may be used for any legitimate business purpose at any time.

Who We Share Information With

We may share information that we collect with our service providers, business partners, and successors to all or part of our business. We will share information that we collect if required by law or to protect you, us, or third parties. For example, we may share information with a government agency upon request, including responding to a court order or subpoena or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our Site for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful. We may also share information with any other third parties with your consent.

We do not sell personally identifiable information, and we will not sell personally identifiable information except as described in this Policy. If we ever decide to sell personally identifiable information, we will provide you with notice and a right to opt-out of such sale.

Mobile Device Location Information

In order to use a product offered through Zero, it is required that you enable the transmission of location information from your mobile phone or mobile device. If the transmission of such information is disabled and you attempt to make a purchase or initiate a transaction, whether at a point-of-sale or through the Internet, we may decline the purchase or transaction. We use the location information we collect to mitigate fraud and other reasons identified under the "How We Use Information" section above.

Third-Party Collection of Information

Some content or applications on the Site may be provided by third parties, including analytics companies and advertising providers. Our Site may also include social media features, such as the Facebook "Like" button, and other widgets, such as the "Share" button or interactive mini-programs provided by third parties. These third parties may use cookies or other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services.

We do not control these third parties' tracking technologies on our Site or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. Some of these third parties may provide you with ways to choose not to have your information collected or used for targeted advertising. For example, some of these companies may be members of the Network Advertising Initiative ("NAI") or the Digital Advertising Alliance ("DAA"), which allow you to opt out of certain types of data collection and use or out of receiving targeted ads from member companies. To opt out, visit http://www.networkadvertising.org/managing/opt_out.asp or www.aboutads.info.

One of the third-party services that we use is Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics may set cookies on your browser or mobile device or read cookies that are already there to collect information. Google Analytics collects information such as how often you use our Site and how you use our Site. We use the information provided by Google Analytics to improve the Site. For more information regarding how Google collects, uses, and shares your information and how to opt out of certain uses please visit <http://www.google.com/policies/privacy/partners/>. By using the Site, you consent to the processing of information about you by Google as described here and in Google's privacy policy.

Our Site may provide links to other websites. Please be aware that when you click on one of these links, you are going to another website, even though the Zero or Level logo, banner, or tool bar may still be visible. Information you enter on

these other websites is being collected by those websites, not Zero. Their privacy policies may allow disclosures and uses of personal information that are not allowed by Zero. We encourage you to read the privacy policies of these linked websites as they may differ from ours.

Privacy Preferences

We may, from time to time, send you e-mails regarding new products that we feel may interest you. To update your marketing preferences to stop receiving these e-mails from us, you can "opt-out" or "unsubscribe" by following the instructions included in each e-mail. Please note that we will still provide responses to your questions, information that you request about a product or service, and e-mails for account-related purposes if you revise your marketing preferences to opt out of receiving promotional material.

Children's Online Privacy

You must be at least the age of majority in the state of your residence to have our permission to use this Site. We do not knowingly collect, use, or disclose information about visitors who are under the age of 13. Our Site is intended for adults and it is not directed to children. If you believe that a child under the age of 13 has given us information, you may e-mail us at legal@levelbank.com. Please include "COPPA" in the subject line.

California Privacy Rights

California law provides California residents the right to request from Zero:

- a list of the categories of Personal Information that we have disclosed to third parties for direct marketing purposes; and
- the names and addresses of all such third parties.

We do not share your Personal Identifying Information with third parties for the third parties' own and independent direct marketing purposes unless we receive your permission.

We will not discriminate against you because you exercise any of the rights as described in this section.

Security

We strive to take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of your personal information. Unfortunately, no method of data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed. We encourage you to be careful when using the Internet or transmitting data through a wireless network.

Do Not Track

The Site does not respond to "do not track" signals sent by Internet browsers.

Contact Us

If you have any questions about this Policy, please feel free to contact us at: legal@levelbank.com.

Effective Date

This Policy is effective as of the date that it is last updated. Unless otherwise stated, any modifications to this Policy will go into immediate effect after they have been posted, as indicated by the Last Updated date located at the top right corner of every page in this Policy.