Privacy Policy

Last Updated June 1, 2026

This Privacy Policy describes how Visible Ideas, Inc. ("Company," "we," and "us") processes personal information about you. This Privacy Policy applies to your access to and use of any website, mobile applications, online service, tool, or platform where this policy is linked or posted, including any of their associated content, features, tools, and materials (collectively, our "Platform"). The term "you" refers to you as a user of the Platform. This Privacy Policy is incorporated into and part of our Terms of Use.

If you have any questions, please contact us as provided below. If you would like to receive this Privacy Policy in a different format, please contact us at support@splitpay.com.

BY ACCESSING OR USING THE PLATFORM, YOU ARE AGREEING TO AND ACCEPTING THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

1. What We Collect

We may collect, use, store and transfer personal information when you use our Platform. The type of information that we collect and how we collect it depends on your interaction and relationship with us. This section explains the types and sources of information we collect.

Information You Provide to Us

- **Account Registration Information.** We will collect certain contact information to allow you to register an account with us. We will collect information such as your first and last name, social security number, date of birth, telephone number, email address, and home address. We collect this information in order to register your account and communicate with you about your account or your use of our Platform. We will also collect your username and password to create your account with us and allow you to access it.

- **Communications Information.** We may collect information about you when you speak with one of our professionals by phone or through our chat services, or when you participate in a survey. Information we may collect through these communications is used to improve your experience on the Platform and provide you with assistance or information related to your use of our Platform. We may also request more information to verify your identity or to meet our legal obligations.

- **Financial Information.** As a registered user of the Platform, you may provide us with access credentials (for example, username and password) that allow us to gain online access to one or more accounts that you maintain with a third-party financial institution and that you choose to designate for use in connection with the Platform. You may also provide us with payment-related information such as credit or debit card number, expiration date, CVV number, and bank account number.

Information We Get From Others

We may get information about you from other sources. We may add this to information we get from you directly.

- **Account Authentication Information.** When you provide us with permission to use biometric information to authenticate your account, we may collect certain mathematical information about your face that is stored on your device. You may opt out of sharing this information at any time by turning it off in your account.

- **Consumer Reporting Information.** We may receive certain nonpublic personal information from consumer reporting agencies about you in order to provide you with our services or Platform.

- **Information from our Service Providers.** We may collect information about you from service providers such as data providers who we partner with to provide you with the services or Platform.

- **Contact, Financial and Transaction Data.** We may collect information about you from providers of technical or payment services.

- **Identity and Contact Data.** We may collect information about you from verification or compliance services providers.

- **Publicly Available Information.** We may collect information from public government sources.

- **Analytics and Advertising Partners.** We may collect information from our third party advertising and data analytics providers. This includes information collected through cookies, pixels and other online technologies as well as information collected when conduct email campaigns and receive site feedback. It also includes when we receive marketing information, such as trends, usage, and activities from our providers.

- **Social Networks.** Depending on the information you choose to share and your privacy settings, we may collect or receive personal information about you. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information. We use all of this information to create inferences about you and your preferences.

Information Automatically Collected

Cookies and Tracking Technology. When you access the Platform, we (and third-party companies we work with) may collect and store certain information by using technologies such as server logs, cookies, web beacons, clear gifs, tags, e-tags, flash cookies, log files, pixels, code, JavaScript packages, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. The information collected includes information about your activities on our Sites, IP address, browser or operating system type and version, device IDs, geolocation, network and website interaction history, website cookie information, interaction with advertisements and browsing time, and browsing/search history and demographic or inferred-interest information, as well as information or communications you have submitted to us through the Sites or Platform.

We use this information to understand general usage and volume statistics, how users navigate to and around our Platform, what content is viewed or accessed, and which products and services have been obtained. We also use these technologies to keep track of your preferences and profile information. We also use these technologies to allow third-parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. For example, our advertising partners may use the fact that you visited our Sites to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices. These third parties partners may use this information for our and their own advertising, analytics, attribution, and reporting purposes. To learn more about interest-based advertising and technologies, and how to opt out, please visit http://www.aboutads.info/choices .

Browsing or Chat Session Information. We use technologies that maintain records of your browsing session, chats, and other activities on our Platform. These technologies may include session replay that maintains a record of your interactions with our Platform; chat providers that maintain a transcript of your chats; cookies, pixels, and other tracking technologies that share some of your interactions with our Platform; and other technologies that collect and share your interactions with our Platform. We use this information for quality control, customer service, fraud prevention and security, and marketing purposes.

Do Not Track Signals. Some browsers have a "do not track" feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Platform is not currently set up to respond to these signals. For more information on Do Not Track signals, please visit https://allaboutdnt.com/ .

Google Analytics. We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Platform, please visit http://www.google.com/policies/privacy/partners . If you would like to opt-out, Google provides a an opt-out tool which is available at https://tools.google.com/dlpage/gaoptout .

2. Use of Personal Information

We use your personal information as follows:

- **To Provide Our Services and Platform.** We use information we collect to provide our services and Platform.

- **To Communicate With You.** We use your personal information to send you information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages. We also use personal information to communicate with you about your use of our services and Platform.

- **Initiate and Send Payment Instructions.** We use your personal information to to initiate and send payment instructions to one or more financial institutions, who will provide the funds transfer services based on those instructions.

- **Marketing and Promotions.** We use your personal information to communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners. We also use

your personal information for targeted or personalized marketing communications.

- **Market Research.** We use your personal information to aggregate and combine with other users and conduct market research in markets where we provide our services or Platforms.

- **Fraud Detection and Prevention.** We use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

- **Information Security.** We use your personal information to ensure the security of our services and Platform, and to investigate any unauthorized attempts to access personal information.

- **Maintenance and Improvement of our Services and Platform.** We use your personal information to provide, maintain, administer, and improve the functionality of our services and Platform, and help us diagnose technical and service problems.

- **Legal.** We use your personal information to comply with our legal obligations, contractual obligations, and other compliance obligations, including reporting requirements. We also use it to defend our legal rights against investigations, allegations, or claims.

- **Combination of Data.** We combine information we obtain from different sources with publicly available information, including to create inferences about you. We combine information that we have collected across other third-party sites. We combine information across third-party sites, such as social media sites, and across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

Other Purposes. We may use personal information for other reasons we may describe to you.

3. Sharing and Disclosure of Information

We may share your personal information as follows:

- Affiliates. We share information with our affiliates and/or subsidiaries and related entities, including where they act as our service providers or for their own internal purposes, and otherwise to meet our legal and regulatory obligations.

- Business Partners. From time to time we may partner with other companies. In some instances, we will need to share information regarding your account with us (including, name, email address, and phone number) with the applicable partner so that they can meet their legal and regulatory obligations.

- Service Providers. We share information with third-party service providers for business purposes, including fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, information technology, storage, and transaction monitoring.

- Banking Partners. If you link a bank account, we will share your account information with our banking partners so that we can process payments associated with wiring funds in and out of your account with us.

We may also need to share your information with your bank based in the country where your bank account is held in order to verify and complete a payment transaction.

- Verification Service Providers. In order to detect and/or prevent fraud and comply with our legal obligations, we will sometimes need to share your information with third party identity verification services. This lets us make sure you are who you say you are, by comparing the information you provide us to public records and other third party databases. This may include searches through electronic services such as credit bureaus, but we will not do so in a manner that would have an adverse impact on your credit or credit score.

- Operational Service Providers. In order to deliver services and Platform to you, we will need to share your information with third parties who provide us with certain tools/services including data storage, onboarding, customer service platforms, accounting and invoicing, IT, email, SMS text, and other communication channels, security and fraud detection.

- Other Service Providers. In order to improve our functionality, we will sometimes share your information with service providers that help us analyze how people are using the Services in order for us to refine the product. We may also share your information with services providers who help us to deliver certain advertising/ marketing campaigns in order to grow our business.

- Professional Advisors. We may share information with our professional advisors for purposes of audits and compliance with our legal obligations.

- Marketing/Analytics/Advertising Partners. We may share personal information with third-party marketing, analytics or advertising partners, including social media platforms and networks, who provide analytics or marketing and advertising services to us.

- Merger or Acquisition. We may share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

- Security and Compelled Disclosure. We may share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

- Government Entities. We may share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.

- Facilitating Requests. We may share information about you at your request or direction.

- Consent. We will share your information with other third parties if you specifically authorize us to do so.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law.

Other Parties

We may integrate technologies operated or controlled by other parties into parts of the Platform. For example, the Platform may include links to third-party websites, plug-ins and applications and other services not operated or controlled by us.

Please note that when you interact with other parties, including when you leave the Platform, those parties may independently collect information about you and solicit information from you. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Dwolla Account Creation and Servicing

In order to use the payment functionality ofservices and Platform, you must open a "Dwolla Account" provided by Dwolla, Inc. and you must accept the Dwolla Terms of Service and Privacy Policy. Any funds held in or transferred through your Dwolla Account are held or transferred by Dwolla's financial institution partners. We will collect and share with Dwolla personal information we have collected about you, including full name, date of birth, social security number, physical address, email address, telephone number, and financial information. You will access and manage your Dwolla Account through our Platform, and Dwolla account notifications will be sent by us, not Dwolla.

4. Protecting Personal Information

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented and maintain technical, organizational, and procedural safeguards designed to protect personal information from unauthorized access and misuse. Unfortunately, the transmission of information via the Internet is not completely secure. Therefore, we cannot guarantee its absolute security and encourage you to use website and share information with caution.. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites or Platform. We encourage you to help us protect your personal information by securing your account using a strong password and using other measures available in your account to authenticate your identity prior to using the Platform or services.

Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Third Party Partners

Certain personal data may be stored with our third party partners and service providers.

Children's Privacy

Our website and Platform are not directed to individuals under the age of 18. If you are under 18, you cannot use our Platform or services or create an account with us. We do not knowingly solicit, collect, or store information from anyone under 18. If we become aware that we have collected or stored personal information from an individual under age 18, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to support@splitpay.com.

5. Email, Call, SMS, and Push Communications

We may communicate with you about our services and Platform using email, telephone, push notifications, SMS or text messages. When we communicate with you via email, telephone, SMS, text message or push notification, we may collect information regarding such communications, such as confirmation when you open an email, answer a call, read a text message or SMS, or receive a push notification. We use this information to operate and improve our customer service and other services and Platform. Some services such as near real-time alerts from the services and Platform require notifications to be enabled. If at any time you do not wish to receive the benefit of such services, you can turn off notifications using the functionality made available in the browser, application or device settings. Please note that turning off notifications, SMS messaging, or text messaging may impact your user experience.

By providing us with your phone number, you authorize us and our service providers to contact you via telephone, text message or SMS, including by using automated dialing systems or pre-recorded voice, at that phone number, and you thereby consent to the receipt of such messages. You may opt-out of receiving most of these calls or messages at any time by sending us a request at support@splitpay.com or by responding "STOP" to any text or SMS message. You acknowledge that opting out of receiving calls, texts or SMS messages may impact your use of the services or Platform. More generally, we may use your contact information to send you messages about the services or Platform, including marketing messages. You may unsubscribe from some of these communications through your account settings, although we reserve the right to contact you when we believe it is necessary, such as for account recovery purposes.

By using the Sites or Platform, you also authorize your wireless carrier to use or disclose information about your account and your wireless device, if available, to us or our service providers for the duration of your business relationship. Carriers are not liable for delayed or undelivered messages. Message and data rates may apply for any messages sent or received.

All the above categories exclude text messaging originator opt-in data and consent; this information will not be

shared with any third parties, excluding aggregators and providers of the text or SMS message services.

6. General

Processing in the United States

Please be aware that information we obtain about you will be processed in the United States by our service providers or us. By using the Platform, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

Support Information

We welcome your comments or questions about this Policy. You may contact us at support@splitpay.com or at +1-877-749-3592 with comments or questions regarding this Policy.

Changes to this Policy

We may change this Policy from time to time. When we do make updates, we'll let you know by changing the date at the top of this Policy. We will notify you of any material changes to our privacy policy as required by law. Please check our Platform periodically for updates. The "Last Updated" legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any part of our Platform . If you ever have any questions about changes made to the Policy, just reach out to support@splitpay.com or call us at +1-877-749-3592.

Your Duty to Inform Us of Changes

It is important that the personal data we hold about you is accurate and current. If you need to add or change any information, you can just log in to your account and make the change in your settings. If you cannot make the change on your own, just reach out to support@splitpay.com or call us at +1-877-749-3592 and we'll take care of it.

California Shine the Light Rights

Individuals who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write to us at the email or postal address set out in the "Support Information" section above and specify that you are making a "California Shine the Light Request." We may require additional information from you to allow us to verify your identity and are only required to respond to requests once per calendar year.