

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

Varo Bank, N.A., (“Varo Bank”, “Varo”, “we”, “us”, or “our”) 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’s online and mobile privacy practices and applies to anyone who visits our websites or Varo branded social media sites or pages, or uses our mobile applications.

**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 U.S. Consumer 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 Policy.

## 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 mobile phone number, social security number (used for identification purposes), or other information that identifies you.

**“Online/Mobile Activity and Device 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 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 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 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.

For example, Varo uses Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in Google's own privacy policy. Google may aggregate data they collect from their various services. You acknowledge and accept that Varo has no control over Google's data collection. We strongly advise you to review Google's privacy policy for details of their data collection practices located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), or you may want to opt out from Google Analytics please check here <https://tools.google.com/dlpage/gaoptout>

### *When You Use Our Mobile Apps*

Additionally, Varo may collect Online/Mobile Activity and Device 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 Link Your Varo Account With Other Financial Institutions, Service Providers, Websites Or Apps*

If you link your Varo Account with other financial institutions, service providers, websites, or apps you expressly give permission for Varo and such other financial institutions, service providers, websites, or apps to transfer, store and process your information in accordance with each entity's respective privacy policies. Therefore you are encouraged to read the privacy policies pertaining to such other financial institutions, service providers, websites or apps. When you link Varo with such entities, Varo can share information related to your identity, accounts, balances, and transaction history with the other entity providing the service.

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

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

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

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 Policy 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 receive Varo Bank products or services, including Payment Services as described in our Bank Account Agreement
- 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 products and services; performing data analytics; and performing accounting, auditing and other internal functions).
- To comply with federal, state or local laws, rules or regulations, or other legal requirements.
- For other purposes that we may specifically disclose at the time you provide or we collect your information.

## How We Share Information

We may disclose Personal Information and Online/Mobile Activity and Device Data that we collect:

- To our affiliates.
- To contractors, third party service providers, and other third parties we use to support our everyday business purposes and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- For fraud management and prevention, including sharing certain personal information and device-identifying technical data about you and your devices with third party service providers, who will compare and add device data and fraud data from and about you to a database of similar device and fraud information in order to provide fraud management and prevention services, which include but are not limited to identifying and blocking access to the applicable service or web site by devices associated with fraudulent or abusive activity. Such information may be used by us and our third party service providers to provide similar fraud management and prevention services for services or web sites not provided by us.
- For any other purpose disclosed by us when you provide the information or with your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the Varo General Terms Agreement, User Agreement, Telephone Use Agreement, Electronic Communications Agreement, or any Product Terms.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Varo, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Varo's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Varo about our App users is among the assets transferred.

## 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 encourages protection of children's information on the internet. Our website and mobile application are not directed to children under the age of 13. We do not intentionally collect personal information from children under 13 on our website or mobile app and request that these individuals not provide us with Personal Information through our website and mobile app. 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 Policy or to the Varo Privacy Notice. Whenever you visit a third-party website, you should review its privacy notice.

## **Information Security**

At Varo, we make your safety and security a top priority and are committed to protecting your information. In accordance with applicable laws, regulations, and industry guidance, we maintain physical, technical, and administrative safeguards designed to protect your Personal Information against unauthorized or accidental access, use, disclosure, acquisition, loss, destruction or alteration.

Varo 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 or app is pretending to be a Varo website or app (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, or by emailing [privacy@varomoney.com](mailto:privacy@varomoney.com).

## **Changes to this Policy**

This Policy describes Varo's current online privacy practices. Varo may change its online privacy practices in the future and we may revise this Policy to reflect material changes. This Policy was last revised October 27, 2022, and is effective as of that date.