



1. ABOUT THIS POLICY

This Privacy Policy (“Policy”) applies to Bilderlings’ website at www.bilderlings.com , the Bilderlings mobile app, and any other Bilderlings-owned websites, applications, or programs that link to this policy.

This Policy, together with our Cookie Policy and the applicable “User Agreement” including the Bilderlings User Agreement (and any additional terms mentioned in our User Agreement) applies to your use of our Services.

Where we use other capitalized words or phrases in this Policy (such as Agreement, Account Profile, Services, and Transaction), these have the same meaning as given to them in the applicable User Agreement, unless we have defined them differently in this Policy.

Notice To California Residents

Notice at Collection of personal information: We list the categories of personal information that we collect below under “What Personal Data We Collect.” We collect personal information about you for business and commercial purposes as described below under “How do we use or Process Your Personal Data.” For more information, including on how to opt-out of the sale or sharing of personal information, please see the “US State Privacy Rights” section below.

2. WHO ARE WE

Any personal data provided to or gathered by our Services is controlled by the applicable Bilderlings affiliate based upon your country of residence. See the table in the “Our Relationship with You” section of this Policy to determine which entity controls the collection and use of your personal data.

3. WHAT PERSONAL DATA DO WE COLLECT

The personal data that we collect from you depends on how you interact with us and our products and services. When we say “personal data” or “personal information” we mean any information related to an identified or identifiable natural person. The following are the categories and specific types of personal data or information we collect:

Basic Identifying Information: including your full name (including alias), postal address, e-mail address, phone number, date of birth, gender, occupation and employer, username or social media handle, or other similar identifiers (including Customer ID auto generated by us to identify you in our system.)

Customer Support Information: Information you give to us when you contact customer support or our offices including call recordings (such as when we record customer service calls for quality assurance).

Government Issued Identification or Records: Including your drivers license, state or government issued identification card, such as a passport, drivers license, military or immigration identity cards or visas, national identification cards), as well as a picture or recording of yourself with your identification documentation, records of proof of address (e.g., utility bill, loan or mortgage statement), tax reference number, social security number, or evidence of how you will fund your Transaction (e.g., bank statement or pay slip).

Marketing & Communications Information: Including your preferences to receive marketing from us and our third-parties, communication preferences, and information we lawfully receive from market research, advertising networks, or analytics providers.

Payment Information: Including your financial or payment instrument details (either debit/credit card) or bank account details.

Promotions & Competitions Information: Including your name and email address and certain other personal information that you may be asked to provide to participate in promotions or competitions.

Recipient Information: Including your recipient's full name, postal address, phone number, depending on the disbursement method selected, certain financial institution or financial account details such as bank account or mobile wallet account. If there is a dispute about where money has been received by your recipient, we may ask you for additional information so we can verify their identity with the financial institution.

Sensitive Personal Data: Including biometric data, mainly face scan information from photos and videos you provide for identity verification purposes and monitoring login activity and your interactions with our site to protect your

account and identify suspicious or fraudulent activity. While we do not process your biometric data, our identity verification service provider, Shufti, processes it on our behalf.

Survey & Feedback Information: Including information such as your name, email address, or other contact information, responses to surveys, reviews, feedback, testimonials and certain other personal information that you may be asked to provide.

Technical Information: Including the hardware and software you use to access our Services, network information, internet service provider, operating system, the type of browser you use, unique device identifier (e.g., your devices IMEI number, MAC address, or mobile number), IP address, other similar unique identifiers.

Usage Information: Including information on your interactions with our Services or Sites or browsing or search activity.

For California residents, please note that we may collect Sensitive Personal Information including social security number, drivers license, state identification card, or passport number and Protected Classifications under California and federal law, including gender and age.

4. HOW DO WE COLLECT YOUR PERSONAL DATA

We collect personal data about you from various sources. For example, we collect and obtain information:

DIRECTLY FROM YOU

We collect personal data you provide, such as when you use our Service, create an Account or Profile, contact us, respond to a survey, interact with us at events, participate in a sweepstakes, contest, or other similar campaign or promotion, respond to a survey, post a review, or sign up to receive emails, text messages, and/or postal mailings.

USING COOKIES OR OTHER AUTOMATIC DATA COLLECTION TECHNOLOGIES

When you visit our website, use our app, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see our Cookie Policy.

FROM OTHER SOURCES

We may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, social media platforms or networks, fraud prevention or identity verification service providers, electronic databases, credit reporting agencies, vendors that provide services on our behalf, or publicly available sources.

5. HOW DO WE USE OR PROCESS YOUR PERSONAL DATA?

We will only use your personal data when the law allows us to. Depending on the country in which you reside, we rely on the following legal bases to process your personal data:

COMPLY WITH LEGAL OBLIGATIONS

We use your personal data to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

- **Security and Fraud Prevention**

We use your personal data to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of Bilderlings and our users, customers, employees, or others.

- **Comply with Applicable Laws**

We use your personal data to comply with applicable laws and regulations, such as those relations to “know-your-customer,” anti-money laundering requirements, sanctions legislation, and the various associated regulatory rules and guidance in relation to risk investigation, risk scoring, fraud, counter terrorist financing, consumer protection and compliant handling.

TO PERFORM A CONTRACT

- **To Provide Our Services**

We use your personal data when you access or use our Services, including to process your Transaction(s), maintain and manage your account, deliver/fulfill promotional offers or rewards, and process payments.

- **Communicating With You**

We use your personal data to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues or feedback, and to provide customer service.

CONSENT OR LEGITIMATE INTEREST

- **Marketing and Promotional Purposes**

We use your personal data for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email, text message or postal mail; to show you advertisements for products and/or services tailored to your interests on social media and other websites; and to administer our new customer promotions, sweepstakes, contests, and other similar promotions.

- **Analytics and Personalization**

We use your personal data to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, mobile apps, advertisements, and communications with you; to improve our websites, app, and marketing campaigns (business and marketing analytics); to personalize your experience, to save you time when you visit our websites and app, and to customize the marketing and advertising that we show you; to understand how you use our app and website.

OTHER BUSINESS OR COMMERCIAL PURPOSES

At your direction or with your consent, we may process certain personal data to fulfill any other business or commercial purposes.

For additional information on our legal bases for processing your personal data, please see the section below entitled, "[What is our Legal Basis for Processing your Personal Data?](#)".

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal data in the following circumstances:

CORPORATE AFFILIATES

We may share personal data with our corporate affiliates, including our parent company, affiliates and subsidiaries. Such corporate affiliates process personal data on our behalf to provide services or in other circumstances with your consent or as permitted or required by law.

SERVICE PROVIDERS

We share certain personal data with third parties that perform services to support our core business functions and internal operations. This includes banks, disbursement providers, or other financial institutions completing your transfer or other financial service request (including payment processors), identity verification or KYC service providers, third parties that provide software and tools to send postal mail, e-mails and text messages, or analyze customer data, provide marketing assistance, administer our reviews, investigate fraudulent activity, conduct customer surveys, and outsourced customer service providers.

THIRD PARTY PARTNERS

We may share your personal data with third parties that we have partnered with to jointly create and offer a product, service, or joint promotion. We may also share your personal data with our banking or distribution partners in the event we suspect you are violating our terms or engaging in fraudulent behavior as it relates to our business. Their use of your information is not governed by this privacy policy, but by their own respective privacy policies.

SOCIAL MEDIA PLATFORMS AND NETWORKS

Some of our websites have features such as, plugins, widgets, or other tools made available by third parties that may result in information being collected or shared between us and the third party. Their use of your information is not governed by this privacy policy, but by their own respective privacy policies.

BUSINESS TRANSACTIONS

If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

LEGAL PROCESS

We may disclose personal data in response to subpoenas, warrants, court orders, government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect our rights or the rights of others; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action

regarding possible illegal activities or violations of our policies.

OTHER INSTANCES

We may ask if you would like us to share your information with other third parties who are not described elsewhere in this Policy.

7. WHY DO WE PROCESS SENSITIVE PERSONAL DATA?

We may ask that you provide biometric data to one of our identity verification providers. Where data protection laws only permit the processing of biometric data with your consent, we will seek your consent prior to the processing.

For example, in order to verify your identity, Bilderlings uses the services of Shufti. Shufti will check if your identity documents are valid, and also confirm that your selfie photo and/or video matches the photo on the documents and may process your biometric information per [Shufti's Terms & Conditions](#) and [Shufti's Privacy Policy](#). The results of the check will then be shared with Bilderlings. Your photo and ID documents will be shared with Shufti for this purpose as well as to allow Shufti to maintain, protect and improve its services.

8. DO WE MAKE AUTOMATED DECISIONS ABOUT YOU?

We use automated processes to check that your access to our services and your use of our services meet our required standard, including verifying your identity, and to help prevent fraud or other illegal activities. These processes may make an automated decision to reject your proposed transaction, to block a suspicious attempt to log into your account, or to close your account. If you feel that an automated process may have impacted you, please contact our Privacy team at privacy@bilderlings.com.

9. WHAT ARE MY PRIVACY RIGHTS?

Our customers in certain regions of the world have specific data privacy rights based upon the applicable privacy laws and regulations. We strive to implement the best privacy practices as a standard for all our customers.

ACCESS YOUR DATA & DATA PORTABILITY

You may request that we provide you a copy of your personal data processed by us. This information will be provided without undue delay subject to certain exceptions or limitations, including if such provision adversely affects the rights and freedoms of others.

CORRECT YOUR DATA / DATA RECTIFICATION

You have the right to request that we update and correct inaccuracies in your personal data. You can update certain information related to your account by logging into your account on our site or app, as applicable or otherwise contacting us as described in the [Exercising Your Privacy Rights](#) section below.

DATA DELETION/ERASURE

You may request to erase your personal data, subject to applicable law. If you close your account, we will mark your account in our database as "Closed," but will keep certain account information for a period of time. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account, and to comply with our legal obligations. However, if you close your account, your personal data will not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Policy.

OBJECT TO THE PROCESSING OF DATA

You have the right to object to us processing or transferring your personal data under certain circumstances. You may object to any processing based on the legitimate interests ground when there is something about your particular situation where you feel processing on this ground impacts your fundamental rights and freedoms.

UNSUBSCRIBE FROM DIRECT MARKETING

You have the right to ask us not to process your personal information for marketing purposes. You can exercise this right at any time by carrying out 'unsubscribe' actions which are made available to you (such as clicking on the 'unsubscribe' link in each promotional email we send you). We will honor your choice and refrain from sending you such communications. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request. You are free to change your marketing choices at any time.

You may also control how we use some of your personal data as part of our Services (such as how we may communicate with you) by confirming your preferences in your Account. Please note that not all communications can be switched off -- for example, we may be required to send you email notices about our Services to comply with our legal obligations under national laws and regulatory guidance.

AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal or similarly significant effects on you, unless there are applicable exceptions under relevant data protection laws. We may reject your request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias or if required by law to adjust the processing.

WITHDRAW YOUR CONSENT

You have the right to withdraw your consent for us to process data, where our lawful basis for processing is based on that consent. Note that withdrawal of consent does not affect the lawfulness of processing which may have taken place prior to withdrawal of consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

US Oregon Residents: List of Third Parties

If you are a resident of the state of Oregon, you have the right to obtain, at our option, a list of specific third parties, other than natural persons, to which we have disclosed: (i) your personal data or (ii) any personal data.

EXERCISING YOUR PRIVACY RIGHTS

To exercise any of the above privacy rights, please submit a request through one of the following methods:

- Sending us an email at privacy@Bilderlings.com using the email associated with your Bilderlings account; or
- Contacting us directly through the mobile app.

We typically do not charge a fee for exercising your privacy rights, but where permitted by law, we may charge a reasonable fee for requests that are excessive or manifestly unfounded.

Identity Verification

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or e-mail to verify your request. If we are unable to contact you or you fail to respond to our requests to identify you, we may be unable to fulfill your request.

10. HOW DO WE PROTECT YOUR DATA?

We employ industry accepted technical and organizational measures to protect the information you submit to us. We protect your sensitive personal data such as bank account number, credit card number, date of birth, and government identification number using encryption in transit and encryption at rest. We leverage access controls to limit access to personal data to those with a need to know. We also require the use of security credentials (which may, for example, include a username and password) from each user who wants to access their information on our Site and/or our App.

Where we have given you (or you have chosen) security credentials (such as a password) that enable you to access certain parts of our Service, you are responsible for keeping these details confidential and secure. Moreover, if you allow access to our Services via using your fingerprint on your Device (for example, via Apple Touch ID), then you should not allow any other person to register their fingerprint on that Device as it may allow them access to our Services and you could be held responsible for their actions. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security and any transmission of personal information is at your own risk. If you have any questions about security, you can contact us at privacy@Bilderlings.com.

11. TRANSFERRING PERSONAL DATA INTERNATIONALLY

We share your personal data within the Bilderlings family of products, including Bilderlings Group entities and subsidiaries, and to external third parties (the categories of which are referred to in this Policy). This may involve transferring your personal data internationally including outside of the country of your residence. Whenever we transfer your personal data internationally we will ensure a similar degree of protection is afforded to it. In some instances, your personal information may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by the applicable data protection authority or government agency (as specified in the Our Relationship With You section below). In other instances, we will ensure at least one of the lawful safeguards are implemented, which may include the use of intra-company agreements, contractual protections, or specific contracts approved (such as standard contractual clauses) by the applicable data protection authority or government agency (as specified in the Our Relationship With You section below), which give personal data the same protection it has in your country of residence.

12. HOW LONG DO WE RETAIN YOUR DATA

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 following based upon your country of residence (among other things):

- obligations and/or retention periods imposed on us by applicable laws and/or our regulators
- the amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data, and
- the purposes for which we process your personal data and whether we can achieve those purposes through other means.

As a regulated financial institution, we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Please note that by using our Services you expressly agree to us retaining your personal data (including data related to your Transactions and our collection and verification of your identity) for at least 7 years following the end of your legal relationship with us.

13. CHANGES TO THIS POLICY

We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on our Site and App. Please review this Policy each time you make a Transaction as it may have been updated since you initially registered for our Services, or since your last Transaction.

If you do not agree with any aspect of this Policy, or any change, you can end your Agreement with us and close your account by emailing us at privacy@Bilderlings.com or otherwise contacting us.

14. LINKS TO THIRD-PARTY WEBSITES AND SERVICES

Our Site and App includes links to other websites whose privacy practices may differ from those of Bilderlings.

If you submit personal information to any of those websites, your information is governed by their privacy policies and we do not accept any responsibility or liability for these policies or for any personal information which may be collected and processed via those websites or services (such as contact and location data). We encourage you to carefully read the privacy policy of any website or software application you use or visit.

This Policy does not cover the practices of third parties that you may engage with when using our Services, such as your mobile network operator or other users of our Services. You should contact the applicable third party about their privacy policy before providing them with any personal information.

15. CHILDREN

We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Services or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Services and if we discover that someone under the age of 18 has registered an Account or Profile with us, we will close it.

16. PRIVACY POLICY TRANSLATION

This Policy is drafted in the English language and translations may be provided in other languages. You agree that the English version of the Policy will control in the event of any inconsistency between the English and any translated versions in any dispute related to this Policy.

17. CONTACT AND COMPLAINTS

If you have any questions, comments, or requests regarding our privacy policy, you may reach out to privacy@Bilderlings.com.

If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to any supervisory authority or other public body with responsibility for enforcing privacy laws, as listed in the section entitled "Our Relationship with You" section.

18. OUR RELATIONSHIP WITH YOU

	Bilderlings Entity	Registered Office	Data Protection Authority
For non-US residents	Bilderlings Pay Limited	13 Regent Street, London SW1Y 4LR, United Kingdom	Information Commissioner's Office (ICO)
For US residents	Bilderlings US, Inc.	1150 Alhambra Circle, 10th Floor, Coral Gables, Florida 33134, United States	Federal Trade Commission (FTC)

19. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

Basic Identifying Information	<p>To comply with our legal obligations. If you do not provide this information, you will not be able to make any Transactions. Performance of a contract with you, namely our User Agreement. Necessary for our or a third party's legitimate interests including to:</p> <ol style="list-style-type: none">1. Collect payment for your use of our Services;2. Troubleshoot issues with your account or our Services;3. Carry out data, trend, and financial analysis, testing, and Service tracking;4. Respond to, handle, and process queries, requests, complaints, applications, and the like;5. Seek customer feedback on, and help us to, track, improve, personalize, and develop, our Services, content, and advertising;6. Monitor and train our customer service and associated teams;7. Give you rewards or incentives for using or recommending our Services;8. Conduct business and marketing analytics;9. Grow our business and inform our marketing strategy and advertising campaigns;10. Collect information that will enable us to understand why and how you interact with us and our Services;11. Work with our third party partners so that we and/or they can offer, provide and/or track rewards, incentives and/or the performance of campaigns;12. Send you service updates and promotional offers;13. Market our Services to you, or conduct market research (provided your marketing and communication preferences in your Account allow us to do this); and,14. Exercise legal rights and/or defend claims.
Customer Support Information	<p>To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above. Performance of a contract with you, namely our User Agreement.</p>

Government Issued Identification or Records	To comply with our legal obligations. Performance of a contract with you, namely our User Agreement. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.
Marketing & Communications Information	Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.
Payment Information	To comply with our legal obligations. Necessary for one or more of the legitimate interests namely to collect payment for your use of our Services.
Promotions & Competitions Information	Performance of a contract with you.
Recipient or Authorized User Information	Performance of a contract with you, namely our User Agreement. To comply with our legal obligations.
Sensitive Personal Data	To comply with our legal obligations. It is also necessary for reasons of substantial public interest (namely preventing or detecting unlawful acts, regulatory requirements relating to unlawful acts and dishonesty and suspicion of terrorist financing or money laundering). Where data protection laws only permit us (or our service providers) to process biometric data with your consent, we will seek your consent prior to the processing.
Survey & Feedback Information	Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.
Technical Information	To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.
Transaction Information	To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.

Usage Information

Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.

20. REGION SPECIFIC PRIVACY TERMS

We do our best to implement the best privacy practices from each region for all of our customers, but if you are in a certain region, here are some specific requirements that may apply to you.

If you are a **California** resident, you may take advantage of the following privacy rights:

- **Right to Know:** You have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- **Right to Delete:** You have the right to delete personal information that we have collected from you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, for our internal purposes, or to comply with a legal obligation.
- **Right to Correct:** You have the right to correct inaccurate personal information that we may maintain about you, subject to appropriate verification.
- **Right to Limit Use of Sensitive Personal Information:** You have the right to limit the use of your sensitive personal information to only that which is necessary for providing products or services.
- **Right to Opt-Out of the Sale or Sharing of Personal Information:** You have the right to opt-out of the "sale" or "sharing" of your personal information, as such terms are defined in California privacy laws.

For California residents: If your Bilderlings account has a California mailing address, we will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. We will limit sharing with our affiliates to the extent required by California law.

For Vermont residents: If your Bilderlings account has a Vermont mailing address, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

If you are a resident of **Virginia**, you may take advantage of certain privacy rights, such as to request access, correction, deletion, or a copy of your personal information. We do not "sell" personal information but may engage in "targeted advertising" as these terms are defined under Virginia law, you may also exercise your right to opt-out of such sales or targeted advertising. You have the right to appeal a denial of your privacy rights.

How to Submit a Request

To take advantage of your right to know, delete, correct, or portability under California or Virginia law, or to submit an appeal of a denial of your privacy rights, please follow the process outlined in the ["Exercising Your Privacy Rights"](#) section above. We may request certain information to verify your identity before we can respond to your access, deletion, correction, or portability requests.

We value your privacy and will not discriminate against you in response to your exercise of your privacy rights.

DATA PROTECTION DISCLOSURES

What categories of Personal Information do we collect and what is the purpose?

You can find a list of the categories of personal information that we collect in the "What Personal Data Do We Collect" section above. For details regarding the sources from which we obtain personal information, please see the ["How Do We Collect Your Personal Data"](#) section above. We collect and use personal information for the business or commercial purposes described in the "How Do We Use Or Process Your

Personal Data" section above.

CATEGORIES OF PERSONAL INFORMATION DISCLOSED AND CATEGORIES OF RECIPIENTS

We disclose the following categories of personal information for business or commercial purposes to the categories of recipients listed below:

- We share Basic Identifying Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Customer Support Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Government Issued Identification or Records with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Marketing & Communications Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Payment Information with: Corporate Affiliates and applicable Service Providers that we engage from time to time to help us comply with our legal obligations in relation to risk scoring, fraud, counter-terrorist financing and anti-money laundering.
- We share Promotions and Competitions Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Recipient or Authorized User Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Sensitive Personal Data with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Survey & Feedback Information with: Corporate Affiliates, Service Providers who help administer our programs, such as Community or product reviews, and Third Party Partners.

- We share Technical Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Transaction Information with: Service Providers, Corporate Affiliates, Third Party Partners.
- We share Usage Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.

For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section. We may also need to share any of the above categories of information pursuant to Legal Process.

Our use of cookies or other tracking technologies may be considered a "sale"/"sharing" under applicable law. You may have the right to opt-out of having your personal data shared for purposes of targeted advertising. We do not knowingly sell the personal data of consumers under 16 years of age.

Categories of Personal Information that may be considered a Sale or Sharing under **California** law: Basic Identifying Information, Technical Information, and Usage Information.

Categories of third parties to whom the personal information was disclosed that may be considered a "sale" or "sharing" under California law: certain Service Providers including advertisers and marketing partners, data analytics providers, and social media networks.

For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section, which provides more detail on our Service Providers and Third Party Partners. We may also need to share any of the above categories of information pursuant to Legal Process.

21. US CONSUMER PRIVACY NOTICE

The following Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses any of Bilderlings' Services for your own personal, family, or household purposes.

WHAT DOES BILDERLINGS US, INC. ISSUING BANK DO WITH YOUR PERSONAL INFORMATION?	
WHY	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Your personal identification information including your Social Security Number • Transaction history and transaction information or instructions
HOW	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Bilderlings chooses to share; and whether you can limit this sharing.

Reasons We Can Share Your Personal Information	Does Bilderlings US, Inc. share?	Can you limit sharing?
For our everyday business purposes – Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – To offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – Information about your transactions and experiences	No	We don't share

For our affiliates' everyday business purposes — Information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

WHO ARE WE?

Bilderlings US, Inc.

WHAT DO WE DO?

How does Bilderlings US, Inc. protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees to access your personal information only when they need it to do their work, and we require companies that work for us to protect your information.

How does Bilderlings collect my personal information?

We collect your personal information, for example, when you:

- open an account or give us your contact information
- use Bilderlings to send or receive funds

We also collect your personal information from others, such as affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using information to market to you
- sharing for nonaffiliates to market to you

DEFINITIONS

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

Nonaffiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include financial companies and banks.

Document Details & Version Control

Document Title:	US Privacy Policy
Document Number:	US-COM-POL-03
Document Owner:	Chief Compliance Officer, US
Effective Date:	June 4, 2025
Last Approved Date:	August 1, 2024
Document Hierarchy:	I
Confidentiality:	External Facing

Version Number	Changes	Effective Date	Approver
Version 2.0	Revisions by new US Compliance Officer	6/4/25	N. Heinonen
Version 1.0	First edition published	8/1/2024	D. Sloan