

goHenry US Privacy Policy v1.0

Introduction

At goHenry we want to be clear and transparent about what information we collect, why we collect it, and how we use that information. Your family's privacy is important to us. This policy will evolve over time as we grow and we will post any changes to this page so please check it from time to time - and don't worry, if we're making major changes, we'll notify you via email, SMS or in-app notifications.

This privacy policy seeks to address any concerns with how your 'Personally Identifiable Information' (PII) may be used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

If you have any questions about your personal data or our privacy policy, please email us at: privacy@gohenrycard.com

The policy applies to the goHenry website, goHenrycard.com (the "**Website**"), the goHenry application for a mobile phone or any other device (the "**Application**"), goHenry Services and all related sites, applications, data storage, services and tools regardless of how you access or use them. By requesting, accessing, or otherwise using our services, products, features, functions, technologies, or content offered on the Website, the Application, and all related sites and applications, regardless of how accessed, including by computer, mobile phone, or any other device (collectively "**goHenry Services**"), you accept this Privacy Policy and agree to the collection and use of your Personal Information in accordance with this Privacy Policy.

A "**goHenry Account**" means the service account at goHenry, established by the Primary Account holder (the parent or guardian), through which the goHenry Services are provided with regard to the Primary Account and Sub-Account(s) (child accounts). The terms "Primary Account," "Primary Account holder," "Sub-Account," and "Sub-Account Cardholder" shall have the same meanings as set forth in the goHenry Terms of Service.

Notice to parents/guardians and other Primary Account holders

As a parent or guardian (or other Primary Account holder) who has signed-up with a child to use the goHenry service, you are giving us explicit prior verifiable consent to collect, use and share their data in the ways specified in this policy. By providing a set of verified contact details for your child or teen, parents and guardians are explicitly giving their permission for their children to be contacted.

We are reliant on you providing accurate information in order to implement our Privacy Policy and cannot be held responsible if you circumvent age restrictions by providing incorrect date of birth information.

We encourage parents and guardians to explain to their children how their information will be used, as set out in this policy.

What information do we collect?

When you use, visit, or otherwise interact with the goHenry Services, the Website, and/or the Application, you will sometimes give information directly to us or to our third-party service providers, including your name, account information, email address, mailing address, phone number, date of birth, or other Personal Information.

Additionally, when you use, visit, or otherwise interact with the goHenry Services, the Website, and/or

the Application, we and our third-party service providers may use technology that stores or collects information sent to us by your computer, browser, mobile phone, or other device. This information may include your IP address, unique device identifiers, or other unique identifier; your device functionality, such as the type of browser, operating system, or hardware used; your device location, which may include a street name and city or GPS-location; mobile network information; your activities within the goHenry Services, the Website, and the Application; your email address and mobile phone number; and other information.

Our website includes social media features, such as the 'Facebook Like button' and Widgets, such as the 'Share This button' or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

When you use the goHenry Services, we also collect information about your transactions and your activities, including financial and payment information.

We may also obtain information about you from third parties, including, but not limited to, credit bureaus and identity verification services.

What we do we do with the information?

We use the information we collect to provide a safer, reliable and convenient goHenry experience. The information we collect from you will be used for the following purposes:

- Processing your account application
- Processing payments into your child's account
- Contacting you when we need to
- Fraud detection and research
- Complying with legal and regulatory requirements
- Sending out goHenry updates (if you have opted in to receive these)
- To improve our service and better understand our business. For example, to carry out statistical analysis, anonymising personal data and publishing the results in an aggregated form (i.e. pocket money stats etc), or using data for internal management reporting and metrics

How do we protect your and your family's information?

We know that security is a major concern for many of our customers, and to give you peace of mind we have the most advanced security systems in place.

To protect your and your family's information we use secure server software that encrypts all information you input before it is sent to us, to minimise the risk of anything being intercepted before we receive it. We also follow a tight security procedure, required under the Data Protection laws, to make sure that any information we store about you or your family is protected from unauthorised access.

If we transfer your information to our servers, or a service provider or agent in another country, we will make sure that we and the service provider or agent agrees to apply the same levels of protection as apply to personal information held and processed in the US and to use your information only for the purpose of providing the service to us.

To protect your and your family's information we also:

- Use full login and security question controls on our system.
- Ensure that access to your information is limited to those who need it in order to do their job.
- Ensure that all our employees sign a confidentiality clause as part of their terms of employment.
- Record all your and your family's calls for training and monitoring purposes.
- Regularly review and update our privacy controls and policy.

Can I improve my or my family's security?

To make sure you keep your information as secure as possible, choose a password that is unique – don't go for anything obvious like family names – and **never** reveal your password to anyone else. Avoid using the same password for several internet sites. When you finish using online websites for shopping or for financial transactions, close your browser to delete temporary cookies from any site you have visited.

We recommend goHenry parents sit down with their children to ensure they understand the above information, and that they also choose a secure password and never share this information with anyone or any other websites.

Will you pass my or my family's data onto third parties?

goHenry will never pass your or your family's details to a third party for marketing purposes without your permission. The circumstances in which we share any of your family's personal information with others are:

- When working with our partners such as our card processor, issuing Bank, payment services provider, risk and security system providers.
- If we ask research companies to contact you for your opinion on our services, in which case we would only give them the necessary details.
- If we sell goHenry to another company, our data records are part of our business.
- In response to subpoenas, court orders or legal process, to the extent permitted and as restricted by law;
- When disclosure is required to maintain the security and integrity of the goHenry website or mobile app, or to protect any user's security or the security of other persons, consistent with applicable laws;
- When disclosure is requested by the registered member who input the personal information;
- In limited circumstances, if required, goHenry may disclose your email address to comply with laws and regulations.

How do we use cookies?

Like all major websites, we use cookies, small text files we send to your computer or other access device, to make interactions between you and us faster and easier. Cookies are not computer programmes, they can't pass on viruses and can't read other information stored on your hard drive. They simply contain and pass on to our website as much information as you have disclosed to us. Cookies allow us to remember your registration details for future visits and allow you to move from one part of our website to another more easily.

It is possible to opt out of cookies via your browser's cookie settings, but if you do this you will not be able to use the goHenry website properly, for example, you may need to enter information repeatedly, or you might not get personalized content that is meaningful to you as many of our functions are dependent on cookies. Cookies are computer specific, so if you log on to any site from a different computer, the cookie settings on that computer will apply.

What about Data over the Internet?

Information about your visits to our website and your interaction with our services may be collected anonymously in order to support our marketing, both on our website and elsewhere on the internet. We sometimes use third-party service providers for this, and the information is collected using what is called a pixel tag, which is industry standard technology. None of your personal information will be collected or used during this process. It is simply about discovering the preferences and choices of our customers, so that we can make decisions about where and how to let people know about goHenry. If you would prefer not to have this anonymous information used please visit [Your Online Choices](#) where you can find out more about both this and other online marketing practises and technologies.

And the data collected from mobile usage?

We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your device. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We may link the information we store within the analytics software to personal data you submit within the application.

My Geo Location

Please be aware goHenry Inc. may have access to your geo-location data as we collect and process the IP address of all devices you use our software on. Collecting and processing your geo-location data refers to mobile devices as well as computers.

Surveys

From time-to-time we may provide you the opportunity to participate in a survey within the goHenry web app or mobile app or via e-mail. If you participate, we may require your name and email address. Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose this information.

Respecting your personal data

Protecting the privacy of the data of parents, children and other users of the goHenry Services is very important to goHenry. We follow the guidelines and rules laid down by COPPA (the Children's Online Privacy Protection Act) and have adopted these policies to keep your children safe.

Please note that there are a few exceptions to these policies as noted below under the heading "Exceptions to Verifiable Parental Consent and Information Collected from Children":

We therefore commit to the following principles regarding how we respect our users' personal data:

- We will NOT knowingly collect, use, or distribute personal information from children under the age of 13 without prior verifiable consent from the parent or guardian (Primary Account holder).
- Personal information we collect from children under the age of 13 will be used solely by goHenry for internal purposes only and will NOT be sold or otherwise distributed to third parties other than as laid out in this Privacy Policy.
- We will NOT knowingly allow children under the age of 13 access to free form chat, message boards, email accounts, or other services within goHenry that would allow them to publicly post or otherwise distribute personal information without prior verifiable consent from a parent or guardian (Primary Account holder).

- We will NOT knowingly ask a child under the age of 13 to divulge more information than is needed to use any goHenry service.
- We will NOT knowingly keep any new personal information that is inadvertently included in a child's email submission, help inquiry, or other one-time request, if we know that the child is under the age of 13.
- We will NOT knowingly post any personal information that is inadvertently included in a child's submission to a general audience contribution area if we know that the child is under the age of 13. Upon notice to us, these submissions will be deleted and handled anonymously thereafter.
- We will NOT knowingly provide any direct link to websites that we feel are unsuitable for children or teens.
- There is currently no place on the goHenry website where a child could share any personal information outside of the Primary Account and Sub-Account(s). Should that change, we will advise children under the age of 13 that they MUST obtain permission from their parent or guardian before sharing ANY personal information.
- We will send the following communications to children & teens to make sure that they are able to make the best of the goHenry service:
 - Essential service communications, e.g. attempted spend at non-permitted merchants, responses to enquiries, etc.
 - goHenry push notifications and usage alerts, e.g. allowance notifications, available balance information, cards blocked or unblocked, transaction details on how much was spent and where the card was used, notifications if your child attempts to breach their spending rules, etc. These notifications form a major part of the goHenry service and we strongly recommend their acceptance, but you may opt-out of receiving these types of communications by turning off push notifications at your or their device level.
 - goHenry updates
- We will not send offers either to you, or your child, through the post.
- In line with Fair Information Practices, we will take the following responsive action should a data breach occur:
 - We will notify you via email within 7 business days
 - We will notify the users via in-site notification within 7 business days

Exceptions to Verifiable Parental Consent and Information Collected from Children

As previously stated in the Privacy Policy, any information collected related to your child will have been provided at sign up or by using the goHenry Services, and we will only use their contact information if you have given your consent for your child to receive our newsletter.

In the following instances, we will NOT obtain verifiable parental consent for the collection of a child's personal information:

- Collecting a child's contact information solely to directly respond to the child's request on a one-time basis (for example, to provide assistance with a particular customer service question). We will not use that information to re-contact the child for any other purpose.
- Collecting a child's contact information and the contact information of his/her parent or guardian (Primary Account holder) solely to directly respond more than once to a specific request from the child (for example, to satisfy the request for a newsletter subscription). In this instance, the parent or guardian (Primary Account holder) will be notified that the child made such a request and be informed of the information provided by the child. The parent or guardian will have an opportunity at any time to revoke the child's request (i.e., unsubscribe). We will not use the child's personal information to re-contact the child for any other purpose.
- When using persistent identifiers on our Website to support the internal operations of our Website which include: maintaining and analyzing the functioning of the Website; performing network communications; authenticating users; personalizing content on the Website; serving contextual advertising or capping the frequency of advertising; protecting the security or integrity of the user, Website or service; and to ensure legal and regulatory compliance. A

"persistent identifier" is a series of numbers that we assign to a user but cannot be reasonably used to identify a specific user.

What if I want to know what information you hold about me or my family?

You can contact us at any time to ask what information we are holding and we will be happy to share it with you unless we are prohibited by law from doing so. You can also request at any time details to be amended if they are deemed to be incorrect i.e. your email addresses, home address etc. If you wish to contact us about the information we hold please email us at privacy@gohenrycard.com. If you'd like this information be provided in hard copy please contact our Data Protection Officer at the address at the bottom of this page.

Can I opt-in or opt-out of receiving offers or updates?

We usually like to send our customers special offers & updates that we think will be of interest to them – special deals for goHenry families, product updates etc. You can choose whether you or your child want to receive offers from us and from other companies. Here's how to let us know your preferences:

Opting In: At sign-up, you can easily opt-in before you submit complete your account application. If at this stage you chose not to opt-in you can update your preferences later by either logging into your parent account and opting-in from your Profile and Settings page (which is found in the "Account" tab) or by emailing us at optin@gohenrycard.com. If you'd like to opt-in your child after sign-up please also just email us at the same address to let us know.

Opting Out – Parents: If you want us to stop contacting you about goHenry offers and updates please login to your parent account and unsubscribe from your Profile and Settings page (which is found in the "Account" tab). Alternatively, you can email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you. We will continue to send you important service information regarding your account – such as acknowledgement of payments received, goHenry mobile notifications and other such key communications.

Opting Out – Children: If you or your child would like to opt-out of messages we send you about goHenry offers and updates please email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you or your child. Please remember that we will continue to send important service information to your child as part of the goHenry services.

Opting Out - all other goHenry users: If you would like to opt-out of messages we send you about goHenry offers and updates please email us at unsubscribe@gohenrycard.com or simply click the unsubscribe link in a marketing email that was sent to you.

Links

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

These third-party websites are not subject to this privacy policy. We strongly recommend that you read the privacy policy of any websites that you visit through us.

I still have more questions

If you have any more questions about your family's personal data or our privacy policy please email us at: privacy@gohenrycard.com . Or you can write to us:

The Data Protection Officer, goHenry Inc.

WeWork, 54 W. 40th St., New York, NY 10018, USA

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