



## Fruitful, Inc. Privacy Policy

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Fruitful, Inc. (“Fruitful”) is committed to the protection of your privacy and confidentiality of your personal information. We understand that keeping your information secure and confidential is critical to earning and keeping your trust. This Privacy Policy describes the specific policies and procedures we use to collect, utilize, disclose, share, and protect your Personal Information.

Fruitful, Inc. offers a subscription-based financial wellness platform, including education, budgeting and technology tools, financial planning and investment management, and banking products, and may offer additional services in the future (the “Services”). We refer to those who establish a membership account with us (“Membership”) as “Members”. We refer to those who visit our website without logging into a Membership or using our service offerings as “Visitors”. We refer to those who apply for, open, and use any of our banking products or services as “Customers” and those who enter into a financial planning and/or investment advisory agreement as “Clients.” This Privacy Policy governs your use of our services, along with our Terms of Service into which this Privacy Policy is incorporated by reference.

## 1. How to use this privacy policy

This Privacy Policy explains how Fruitful gathers and uses your Personal Information in the context of each of Fruitful’s service offerings. All of Fruitful’s services are made available through Fruitful’s website, <https://my.fruitful.com> (“Site”). In particular, we describe how your Personal Information is shared and/or disclosed, and how we collect and use other non-Personal Information. We also describe how we address other privacy and security matters – such as our overall security practices, deletion of your Personal Information upon request, and opting-out of marketing communications. Lastly, we describe methods for contacting Fruitful if you have privacy or security questions, comments, or feedback.

## 2. Information collection

The types of information we collect depend on whether you are a current or former Member, Visitor, Customer and/or Client. We collect Personal Information from you when you voluntarily provide it to us. Examples of instances when we collect Personal Information include:

- when you answer questions on the Site to determine what kind of services we might recommend if you were to become a Member, Customer and/or a Client;

- when you register to become a Member;
- when you contact our Hospitality Team with service or support questions or;
- when you become a Member, Customer or Client;
- Wherever Fruitful collects Personal Information, we endeavor to provide a link to this Privacy Policy.

## 2.1. Information we collect from you

We collect personal information such as name, address, telephone number and other optional information you may provide, such as your age, financial assets, which may include the options and shares you hold, income in

## 2.2. Information we collect from Customers and Clients

If you choose to become a Customer and/or a Client, in addition to the information we collect from you as a Member, described above, we will ask you for certain additional Personal Information, including but are not limited to:

- Your name, alias, date of birth, citizenship and passport number, visa information, home address, telephone number, email address, Social Security number, bank account number, bank routing number, bank account login credentials, bank name, employer name, employment status, and job position.
- Certain features of the Services will allow you to link your credit card, debit card, and bank accounts to your Fruitful account(s) by providing your account number, card number, and other identifying information relating to your debit or credit card, billing address, and similar information.
- Whether you are a “politically exposed person,” whether you are a “control person,” annual income range, total net worth range, and other information as appropriate for our legitimate business needs.
- We may collect information derived or resulting from voluntary surveys. We may also collect Personal Information when you voluntarily provide us with Personal Information as a Visitor, such as when you use our “Contact Us” form.
- We may record any support or service calls and maintain such recordings to better improve our Services.

- We may collect information for purposes of identity verification, government-issued identification documents and self-portrait photographs (“Selife”); and other information required by federal and industry laws and regulations.
- Internet or other network activity information, such as information regarding how individuals interact with the Site, emails, or marketing materials.

### 2.3. Information regarding children

Due to the nature of our business, Services and benefits are not marketed to minors. Fruitful does not knowingly solicit Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information to Fruitful. If we learn that we have collected Personal Information directly from a minor, we will delete such information from our files. If a parent or guardian becomes aware that his or her child under the age of 18 has directly provided us with Personal Information without his or her consent, he or she should contact us at [privacy@fruitful.com](mailto:privacy@fruitful.com) and we will delete such information from our files.

### 2.4. Other ways we collect information

Other means by which we collect Personal Information include the following:

- Anonymized or aggregated Information: Fruitful’s Site automatically records certain anonymized or aggregated information about your use or evaluation of the Services. Anonymized or aggregated information is used for a variety of functions, including the measurement of Visitors’ or Members’ interest in and use of various portions or features of the Site. Anonymized or aggregated information is not Personal Information, and we may use and distribute such information in several ways, including internal analysis, analytics, and research. We may share this information with third parties for our purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- Cookies and Pixels: Like other technology platforms and services, Fruitful uses cookies, a small piece of computer code that enables our Web servers to “identify” Members, each time an individual initiates a session on our websites. A cookie is set to identify you and tailor the Site to you. Cookies do not store any of the Personal Information that you provided to us; they are simply identifiers. You may delete cookie files from your own hard drive at any time. However,

cookies may be necessary to provide access to much of the content and many of the features of the Site. For more information on how we use cookies, please see our Cookie Policy.

- Pixel Tags: Along with cookies, we may use “pixel tags,” also known as “web beacons,” which are small graphic files that allow us to monitor the use of our Site. A pixel tag can collect information such as the Internet Protocol (“IP”) address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server.
- Site Activity: Fruitful may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on our Site. For more information on these third parties, including how to opt out from certain data collection, please visit the site below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Site or our Services. For Google Analytics, please visit [www.google.com/analytics](http://www.google.com/analytics)
- “Do Not Track” Technology: We do not collect personal information about your online activities over time and across different web sites or online services. Therefore, our Site does not respond to Do Not Track (“DNT”) signals. We do not knowingly authorize third parties to collect Personal Information about your online activities over time and across different web sites or online services.

## 2.5 Information we collect from other sources

We obtain information about you from other sources as described below.

- Vendors and Business Partners: We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, as well as inferred fraud risk, from identity verification and fraud prevention partners.
- Financial Account Linking: Fruitful offers financial account linking and data aggregation services through Plaid Inc. (“Plaid”) and MoneyKit UK Ltd. (“MoneyKit”).

- Plaid: By utilizing these services, you acknowledge and agree that the terms of Plaid's Privacy Policy (currently located at <https://plaid.com/legal/#end-user-privacy-policy>) will govern Plaid's use of such information, and you consent to Plaid's Privacy Policy. Further, you expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services.
- MoneyKit: By using the Services, you agree to the MoneyKit End User Terms of Service (currently located at <https://moneykit.com/privacy#terms>) and Privacy Policy (currently located at <https://moneykit.com/privacy#privacy>), which is an essential part of the Terms (collectively, the "Terms"). These Terms are a legal agreement between you and MoneyKit. Please read these Terms carefully. Any terms not defined in these Terms have the meanings given to them in our Privacy Policy.
- Publicly Available Data: includes contact information, your interactions with our social media platforms, and other information from publicly available sources, such as public websites.

## 3. How we use information

### 3.1. Use of personal information

We use your Personal Information to provide our Service, to help you evaluate our Service, offer you new products or services, and enhance our Service. We may also use your Personal Information in several ways, including research, internal analysis, and analytics.

### 3.2. Member, Client and Customer personal information

Fruitful stores, processes, and maintains Personal Information related to you to provide Member support, offer new products or services and provide our Services to Members, Customers and Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission (the "SEC") and the Consumer Financial Protection Bureau ("CFPB"). As a Visitor, you may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a Member, Customer or Client.

### 3.3. Information and onward transfer

We will not sell, rent, or trade your Personal Information (whether you are a current or former Customer or Client) to any nonaffiliated third parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Service. To the extent permitted by law, we may also disclose Personal Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Personal Information is necessary or advisable, for example, to protect the rights, property, or safety of Fruitful or others.

### 3.4 Affiliates

Fruitful may share your Personal Information among affiliated Fruitful entities in connection with the marketing and/or provision of Services to Members, Customers, and Clients.

### 3.5. Service Providers

There are certain circumstances in which we may share your Personal Information with non-affiliated third-party services providers, including to perform certain business and technology related functions and to support provision of the Services.

### 3.6. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your Personal Information may be transferred as part of such a transaction, as permitted by law and/or contract.

### 3.7. No renting, selling or trading out list

We will not share your Personal Information with non-affiliated third parties that may use such information to market to you without obtaining your opt-in consent. For example, we may offer you a product opportunity that requires us to share your Personal Information with non-affiliated third parties that may use such information to market to you. We will obtain your opt-in consent to such sharing of your Personal Information when we present you with the terms of such offer. If you have opted-in for

this kind of sharing, then you may: (i) choose to opt-out of such sharing by contacting us at [privacy@fruitful.com](mailto:privacy@fruitful.com); or (ii) request certain information regarding our disclosure of such Personal Information to such non-affiliated third parties by contacting us at [privacy@fruitful.com](mailto:privacy@fruitful.com). If you would like to opt-out of our sharing of your Personal Information with its affiliates so that such affiliates can use your Personal Information to market to you, please contact us at [privacy@fruitful.com](mailto:privacy@fruitful.com).

### 3.8. Reviewing and updating your personal information

You can update information associated with your Membership that we collect for you by contacting our Hospitality Team at [support@fruitful.com](mailto:support@fruitful.com). The credibility and relevance of our services depend on your providing us with complete, accurate and up-to-date information about yourself and your accounts, both now and in the future.

### 3.9. Email marketing opt-out

You may opt out of marketing emails by notifying us at any time by sending an email to [privacy@fruitful.com](mailto:privacy@fruitful.com) or by choosing to opt out of receiving additional promotional communications from us by clicking on the 'unsubscribe' link in any such message, or by following any instructions we may include in the message sent to you (the "Opt-out request"). Please note that, once we receive your request, it may take an additional period of time for the Opt-Out Request to become effective.

### 3.10. Deletion/retention of personal information

Unless you request otherwise, we will retain the Personal Information we collect from you indefinitely. Some Fruitful entities must comply with certain legal and regulatory requirements pertaining to record retention. We will respond to any requests we receive asking that we delete Personal Information that we possess from those who have used our services, downloaded our Dashboard or registered and established a user profile. However, we will not delete information that we are required to retain in order to comply with applicable laws and regulations.

## 4. Security

Fruitful takes reasonable steps, endeavoring to use appropriate technical or organizational measures, to protect your Personal Information from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. However, no Internet, email, or electronic operating system that enables the



transmission of data is ever fully secure or error free therefore, we cannot ensure or warrant the security of any information you transmit to us.

## 5. Important information

### 5.1. Former Members, Customers and Clients

If you are a former Member, Customer or Client, these policies also apply to you; we treat your information with the same care as we do information about current Members, Customers and Clients.

### 5.2. How you accept this policy

By using and continuing to use the Site and/or Services, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this privacy policy and any updates thereto. This policy may change from time to time. This is our entire and exclusive privacy policy and it supersedes any earlier version.

### 5.3. Changes to the policy

We may modify this privacy policy over time without prior notice by posting a new version of this privacy policy, which is your responsibility to review. Any changes to the privacy policy will be reflected on this page and will become effective immediately upon posting. We encourage you to periodically review this privacy policy to stay informed about how we are protecting the personally identifiable information we collect. If changes to the privacy policy are material, we will do our best to notify you via email or through a notification on the site or app. Please check the effective date at the top of this page to determine if there have been any changes since you have last reviewed the Privacy Policy.

### 5.4. Your rights as a Vermont resident

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us by entering into our Membership Agreement, please contact us at [privacy@fruitful.com](mailto:privacy@fruitful.com). Please note, however, that we will not be able to provide you with services through Fruitful without the ability to share this financial information.

## 5.5. Your rights as a California resident

This section provides additional details about the personal information we collect about California residents and the rights afforded to them under the California Consumer Privacy Act (“CCPA”). Please note that the CCPA does not apply to what is referred to as nonpublic personal information collected by financial institutions (like Fruitful), as that information is subject instead to other financial privacy laws. As a result, the CCPA does not apply to most of the information that Fruitful collects.

Subject to certain limitations and exceptions, the CCPA provides California residents the right to request more details about the categories and specific elements of personal information we collect, to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. We do not sell information about you to third parties.

In the last 12 months, we collected the personal information described above and used the information as also described above.

California residents may make a consumer rights request to access or delete certain personal information not otherwise exempt from such requests under applicable law. A request may be made by email to [privacy@fruitful.com](mailto:privacy@fruitful.com). We may verify the request by asking you to provide information that matches information we have on file about you. You can also designate an authorized agent to exercise these rights on your behalf, but we will require proof that the person is authorized to act on your behalf and may also still ask you to verify your identity with us directly.

## 5.6. International Visitors

This Service is only available to residents of the United States. If you are an international visitor, you should note that you are: (i) permitting the transfer of your personal information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal information in accordance with this privacy policy.