

Gelt Privacy Policy

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This privacy policy and notice ("Privacy Policy") explains how Better Technologies, Inc. d/b/a Gelt ("Gelt", "we," or "us") collects, uses, discloses, and protects personal information. It also provides you with important information about your personal information choices.

Privacy Notice at Collection

We collect and disclose information that identifies, relates to, or could reasonably be linked, directly or indirectly, with a particular individual, household, or device ("personal information"). Personal information does not include information publicly available from government records. Personal information does not include information that is not personal, like anonymous, deidentified, or aggregated data, even if it comes from personal information. For personal information covered by the Gramm-Leach-Bliley Act ("GLBA"), please see our [US Consumer Privacy Notice](#).

We collect and disclose personal information in a variety of contexts. For example, we collect and disclose personal information to provide our tax platform and our tax services to individuals and businesses and for our employment and human resources purposes. The information we collect from a business or individual will vary based on several factors, such as the business or individual's tax situation or relationship with us.

Personal Information We Collect and Disclose

We collect and disclose personal information for our business purposes. The following are categories of personal information we collect and disclose, and examples of types of personal information we collect and disclose in each category (the actual personal information we collect and disclose about you may vary from this list):

- **Identifiers**, such as name, alias, postal address (current and historical), unique personal identifier, online identifier, device identifiers, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, EIN, ITIN, and other similar identifiers
- **Personal information** (some personal information included this category may overlap with other categories), such as name, signature, Social Security number, address, domicile/residency, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, and other financial information (such as bank and credit card statements, investment transactions, cryptocurrency transactions, 401k and other retirement account information, income, assets, and liabilities, tax returns, and other information relating to the tax situation of an individual or business), and medical and health insurance information (including billing information)
- **Characteristics of protected persons**, such as age, date of birth, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental

disability, sex (including gender, pregnancy or childbirth and related medical conditions), and veteran or military status

- **Commercial information**, such as records of personal property, services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- **Internet or other similar network activity**, such as browser type and interactions with our platform and services
- **Professional or employment-related information**, such as occupation, current and past employers and job history, job titles, compensation, taxes and deductions, and information and forms submitted to taxing authorities (including W-2 and 1099)
- **Non-public education information**, including education records, such as student financial information (including student loan and tuition information), student identification codes, and student transcripts
- **Inferences** drawn from any of the personal information listed in this section; for example, to create a profile of an individual's preferences and characteristics
- **Preference information**, including preferences related to marketing, advertising, privacy, communications, and participation in our programs
- **Other information you choose to provide**, like when you submit a customer service query, enter a contest or promotion, provide a testimonial or review, or otherwise communicate with us

We collect the following categories of “sensitive personal information” (as defined in the California Privacy Rights Act of 2020 (“CPRA”) – some information included these categories may overlap with the above categories):

- **Government identifiers**, such as Social Security number, driver's license number, state identification card, and passport number
- **Complete account access credentials** to access your Gelt accounts and certain third-party accounts, such as usernames, email addresses, account numbers, or card numbers combined with required access or security codes or passwords
- **Racial or ethnical origin**, such as national origin or citizenship
- **Religious or philosophical beliefs**, for example if you submit this information to support religious-based tax exemptions
- **Mail, email, or text message contents not directed to us**, for example, communications you submit in relation to your tax returns
- **Health, sex life, or sexual orientation information**, for example, information supporting medical expense deductions or dependent information

When we refer to personal information in this notice and Privacy Policy, such reference includes sensitive personal information.

Sources of Personal Information Collected

We collect personal information about you in the following ways:

- **Directly from you**, such as when you use our tax platform or tax services or when you communicate or interact with us in any way, including mail, email, phone, chat, QR code, or social media
- **Indirectly from you**, for example, we collect browser type, device identifiers, IP address, and other information from your activity on our website and interactions on our platform
- **From other users**, for example, our business customers may provide information about you as their employee, member, or partner; we may also receive information about you from your head of household, spouse, tax preparer, accountant, or bookkeeper

- **From third-party service providers** connected to our tax platform or tax services, for example, service providers who provide us with your financial account or investment information
- **From other sources**, such as financial institutions, government agencies (including tax agencies), social media platforms, and analytics providers

Use and Disclosure of Personal Information

We may use or disclose any of the categories of personal information described in the section [Personal Information We Collect and Disclose](#) for one or more of the following business purposes:

- **Provide and manage our services**, including to provide tax services, maintain our tax platform, store and process personal information, provide customer service, verify customer information, and provide account notifications
- **Support our everyday operations, including compliance requirements**, including to enable the use of service providers for business purposes, perform monitoring and reporting, enable information security and anti-fraud operations, prevent harm to and protect the rights, property or safety of us, our affiliates, our users, yourself or any third-party, support audits and investigations, investigate and respond to disputes, exercise and defend legal claims, respond to legal, governmental, or law enforcement requests, subpoenas, or orders, and comply with and enforce laws, regulations, policies, procedures, and contractual obligations
- **Develop and improve our business and services**, including to develop, customize, and improve our products and services, market and advertise our services to you, conduct surveys, research, analysis, and technical diagnostics, and support customer relationship management
- **Evaluate or conduct business changes**, including a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
- **Support employees and human resource management**, including to provide benefits to employees and dependents, manage pay and compensation, and process employment applications

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may share any of the personal information we collect by disclosing it to the following categories of third parties for our business purposes:

- **Platform service providers** who connect with you via our tax platform to provide certain services and features; in some cases, you will automatically share your personal information with these service providers via their sites and, in some cases, the service provider's privacy policy may apply
- **Other of our vendors and service providers** who provide services such as tax advisory and preparation, information technology and infrastructure, legal, audit, or other advisory services, data analysis, and marketing and marketing research activities
- **Our affiliates and subsidiaries** for all of our business purposes described above, including marketing to you
- **Government authorities, law enforcement**, or other persons in order to comply with legal or compliance obligations or policies or to protect or defend our rights or property

- **Potential purchasers** of Gelt or our affiliates or subsidiaries
- **Other third parties** for uses described in this Privacy Policy or for purposes you have requested

Our platform and services may contain links to third-party websites or applications. We do not have control over the privacy practices or the content of these third-party websites or applications. As such, we are not responsible for the privacy practices employed by or content contained on websites or applications linked to or from our platform and services. You should check the applicable third-party privacy policy and terms of service when visiting any other websites or applications, and before providing any personal information to them.

We may use Plaid, Inc. to gather data, including personal information, from financial institutions. You agree to personal information being transferred, stored, and processed by Plaid in accordance with the [Plaid privacy policy](#).

Sale of Personal Information or Sharing for Cross-Context Behavioral Advertising

We do not sell personal information, including personal information of minors under the age of 16. For purposes of this notice and Privacy Policy, “sell” means the disclosure of personal information to a third party for money or other valuable consideration.

We do not share personal information with third parties for cross-context behavioral advertising.

Retention Period

We retain personal information for such periods as are reasonably necessary to achieve the collection and use purposes described in this notice and Privacy Policy.

Retention periods will be determined by taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

If you deactivate your account or request that we delete your personal information, we may retain certain data and personal information associated with your account for record-keeping integrity, as well as to prevent fraud, collect any fees owed, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our platform, services, or our users, or take other actions otherwise permitted by applicable law. In addition, if certain information was provided to third parties as described in this Privacy Policy, retention of that information may be subject to those third parties’ policies.

Your Privacy Rights and Choices

Your Personal Information Rights

Subject to exemptions and restrictions provided by applicable law, you have the right to:

- (1) Request that we disclose certain information to you about our collection and use of your personal information (the “**right to know**”):
 - The categories of personal information we collected about you

- The categories of sources for the personal information we collected about you
 - Our business purpose(s) for collecting or sharing that personal information
 - The categories of third parties with whom we shared your personal information, identifying the personal information categories that each category of recipient obtained and the purpose(s) for sharing your personal information
 - The specific pieces of personal information we collected about you (also called a “**data portability request**”).
- (2) Request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions under applicable privacy law (the “**right to delete**”).
 - (3) Direct us to not sell your personal information at any time (the “**right to opt out of sale**”). We do not sell personal information, including personal information of minors under the age of 16.
 - (4) Direct us to not share your personal information for cross-context behavioral advertising purposes (the “**right to opt out of behavioral advertising**”). We do not share your personal information for cross-context behavioral advertising.
 - (5) Direct us not to share your personal information for the purposes of making automated decisions, including profiling, that produce legal or similarly significant effects concerning you (the “**right to opt out of profiling**”). We do not share your personal information for profiling purposes.
 - (6) Limit the use or disclosure of your sensitive personal information to just those actions necessary to perform specific purposes outlined by law (the “**right to limit use of sensitive information**”). We only use or disclose sensitive personal information for purposes that would continue to be allowable after the receipt of a limitation request, including to provide services and ensure the security and integrity of your account.
 - (7) Correct inaccurate personal information (the “**right to correct**”).
 - (8) Be free from unlawful discrimination for exercising your rights under applicable privacy law.

How to Exercise Your Personal Information Rights

To exercise your rights as described above, please submit a request by:

- Emailing us at info@joingelt.com

You must describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. We will work to process all verified requests within

45 days. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

We may ask for information to verify your identity, such as name, contact information, government identifier, or date of birth.

You may authorize an agent to make a request on your behalf by contacting us at the email address listed above. As part of our verification process, we may require, as applicable:

- Information to verify the requestor's identity, such as name, contact information, government identifier, or date of birth (if the requestor is individual), or the requestor's active registration with a state or governmental agency (if the requestor is a company or organization)
- information to verify the identity of the person on whose behalf such request is made, such as name, contact information, government identifier, or date of birth
- a document to confirm that the requestor is authorized to make the request, such as a power of attorney; we may require proof of authorization and verification of identity directly from the person on whose behalf the request is made.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we may not honor your request where not required or an exception applies under applicable privacy laws. For example, we may deny a deletion request if the information is necessary for us to provide services to you or comply with our legal obligations and compliance policies. We may deny a right to know request made more than twice in a 12-month period or for information collected and disclosed more than 12 months ago.

We will advise you in our response if we are not able to honor your request.

Manage How We Communicate with You

We offer you choices about how to manage how we communicate with you.

- **Email.** You may opt out of receiving marketing emails from us at any time by sending a request to info@joingelt.com or by clicking on the unsubscribe link in our emails. You will continue to receive service-related emails.
- **Postal Mail.** To opt out of postal mail marketing, please send your request to info@joingelt.com and include your postal address in the body of the email.
- **Telephone Calls/Text Messages.** To opt out of telephone and text message marketing, please send your request to info@joingelt.com and include your phone number in the body of the email.
- **Updating Your Profile.** You may update or correct your personal information related to your account through your dashboard of your account or by sending a request to info@joingelt.com.
- **Limiting Sharing with our Affiliates to Market to You.** You may opt out of our sharing your personal information with our affiliates to market to you by sending a request to info@joingelt.com and including your contact information (email, direct mail, and telephone number) that you request to be opted out of sharing.

We will respond to your communication preference requests within a reasonable timeframe.

Your Right to Know - Our Use of Personal Information in the Last 12 Months

In the last 12 months, we have collected and disclosed the following categories of personal information and sensitive personal information to the following categories of third parties for our business purposes:

Category of Personal Information (See descriptions in section Personal Information We Collect and Disclose)	Collected in Last 12 Months	Disclosed in Last 12 Months	Category of Third-Party Recipients for Business Purposes (See descriptions in section Use and Disclosure of Personal Information)
Identifiers	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Personal information	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Characteristics of protected persons	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Commercial information	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Biometric information, such as fingerprints and voiceprints	No	Not applicable	Not applicable
Internet or other similar network activity	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Geolocation data, such as device location	No	Not applicable	Not applicable

Sensory data, such as audio, electronic, visual, thermal, or olfactory data, including call and video recordings	No	Not applicable	Not applicable
Professional or employment-related information	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Non-public education information	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Inferences drawn from other personal information	No	Not applicable	Not applicable
Preference information	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Other information you choose to provide	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Government identifiers	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Complete account credentials	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Precise geolocation	No	Not applicable	Not applicable
Racial or ethnic origin	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers

			<ul style="list-style-type: none"> • Our affiliates and subsidiaries
Religious or philosophical beliefs	No	Not applicable	Not applicable
Union membership	No	Not applicable	Not applicable
Genetic data	No	Not applicable	Not applicable
Mail, email, or text message contents not directed at us	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries
Biometric information for the purpose of uniquely identifying an individual	No	Not applicable	Not applicable
Health, sex life, or sexual orientation	Yes	Yes	<ul style="list-style-type: none"> • Platform service providers • Other vendors and service providers • Our affiliates and subsidiaries

In the past 12 months, we have not sold personal information, including personal information of minors under the age of 16.

You may request information about whether a business has disclosed personal information to any third parties for their direct marketing purposes. We don't disclose personal information to third parties for their marketing purposes, other than our affiliates and subsidiaries.

Additional Privacy Information

Children's Privacy

Our platform and services are not intended for or directed to children. You cannot create an account with us or use our platform and services if you are under the age of 18. We don't knowingly collect personal information directly from children under the age of 18. If you believe we may have obtained personal information directly from a child, please contact us as provided below.

In connection with the tax platform and tax services we offer, we may obtain information about children under the age of 18 if a parent or legal guardian submits or shares such information with us. For example, we may collect information from parents or guardians about their children claimed as dependents on tax returns. We prohibit our users from providing information about a child under 18 without first obtaining the consent of the parent or legal guardian. By providing information regarding a child under the age of 18, you are affirming that you have the consent of the child's parent or guardian.

We may share children's personal information for our business purposes to the categories of third parties as described in the section [Use and Disclosure of Personal Information](#).

Your Rights as a Parent or Guardian

Parents and guardians have rights when it comes to their children's information:

- To change their mind and withdraw consent to the collection of their child(ren)'s personal information
- To see the personal information we collect about their child(ren)
- To ask us to delete personal information we have collected about their child(ren)

The operator of our website is: Better Technologies, Inc. d/b/a Gelt

You can exercise any of your rights as a parent or guardian or make any other inquiry about your child(ren)'s privacy by contacting the operator of our website by:

- Emailing us at info@joingelt.com

We may need to collect some information from you to confirm you are the parent or guardian, such as your and your child's name, contact information, government identifier, or date of birth.

Patient Information

We may collect personal health information (for example, medical bills supporting a tax deduction), including deidentified patient information. We do not deidentify patient information ourselves.

We may disclose personal health information, including deidentified patient information, to third parties for our business purposes as described in the section [Use and Disclosure of Personal Information](#). We do not use or share personal health information for marketing purposes.

We do not sell personal health information, including deidentified patient information.

Cookies

We use cookies and other technologies or methods of web and mobile analysis to gather, store, and track certain information related with your access to and activity through our platform and services. A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and may be used for various different purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between our services and you quicker, easier and smoother.

We use the following types of cookies:

- Session Cookies, which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed.

- Persistent Cookies, which are saved on your device for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to identify who you are for repeated visits (for instance, to allow us to store your preferences for the next visit to our page).

You may remove the cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of our platform and services may not operate properly and your online experience may be limited.

Do Not Track

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. We do not currently respond to Do Not Track browser settings or signals.

International Transfer, Storage, and Processing

We operate from the United States of America, and the personal information we collect or receive is stored and processed in the United States of America. We may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world subject to the provision of this Privacy Policy. We currently hold and maintain personal information in the State of Israel.

If you are located in the European Union or other regions with laws governing data collection and use that may differ from United States law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the United States or any other country in which we, our affiliates, or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

Security of Your Personal Information

We use administrative, technical, contractual, and physical safeguards designed to protect your personal information. Despite our efforts to ensure security, we cannot guarantee or warrant that your personal information will not be accessed, acquired, disclosed for an improper purpose, altered, or destroyed by an unauthorized person or as a result of a breach of our security safeguards. We cannot ensure the security of any information transmitted to us over the internet, and to the fullest extent permitted by applicable law, we accept no liability for any unintentional disclosure of such information. Therefore, we urge you to take adequate precautions to protect your personal information as well, including, without limitation, never sharing the username and password used in connection with our tax platform or tax services.

We may correct, replenish or remove incomplete or inaccurate information, at any time and in our sole discretion.

Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we do, we will post the revised notice on this webpage with a new "Last Updated" date. Your

continued use of our website, platform, or services, or your provision of personal information to us following the posting of changes constitutes your acceptance of such changes. We encourage you to visit this page regularly for any changes.

Contact Information

You may contact us with questions or concerns about this Privacy Policy and our privacy policies and practices by emailing us at info@joingelt.com.

If you are unable to review or access this Privacy Policy due to a disability, please email us at the email address above so we can share it in another format.