

**UTOPPIA, INC.**  
**PRIVACY POLICY**

Effective as of September 14th, 2022

If you are reading this Privacy Policy (“Policy”), that means you have created an account using Utoppia’s mobile phone application (“Mobile App”) to power your cash management needs or you are otherwise using Utoppia’s Mobile App and services under the Utoppia Terms of Service. By using Utoppia’s services, signing an electronic signature card or opening an account (“Account”) with us, you agree to Utoppia’s Policy. We may update this Policy from time to time and we will provide updates as required by law. We may update this Policy from time to time and the continued use of our services means acceptance of this Policy. ***If you do not agree to the Policy as last revised, do not use (or continue to use) the Services (as defined below).***

We partner with Synapse Brokerage LLC, a registered broker-dealer and member of FINRA and SIPC (“Synapse”) to provide you with an Account (a cash management account) provided by Synapse where you will participate in Insured Network Deposit (“IND”) sweep services (the “Sweep Service”). Under the Sweep Service, balances in your Account will be deposited into accounts at one or more banks (“Participating Depository Institutions”), in accordance with the Insured Network Deposit Sweep Disclosures (“Sweep Disclosures”) available on the Mobile App. In addition to the cash management services offered by us through Synapse, we also provide on the Mobile App, through Synapse, certain digital currency services. Therefore, depending on the financial service you obtain, your personal data also will be collected, used and shared by financial services providers (“Financial Services Partners”), including as applicable Participating Depository Institutions and/or other of Synapse’s digital currency service partners (the “Digital Currency Service Partners”). By agreeing to Utoppia’s Policy, you also agree to Synapse’s privacy policy, as may be amended or restated from time to time by Synapse, and found at: <https://synapsefi.com/privacy>.

Utoppia takes our customers’ privacy and security very seriously as provided herein. To demonstrate our commitment to privacy and security, we have developed this Policy to explain how we may collect, retain, process, share, and transfer your information.

**1. Policy Overview**

- 1.1 In this Policy, “Services” refers to any products, services, content, features, technologies, or functions made available to you by Utoppia as a technology service provider working with Synapse and its Participating Depository Institutions and Digital Currency Service Partners via the Mobile App.
- 1.2 The terms “Utoppia,” “we,” “us” or “our” shall refer to Utoppia, Inc. The terms “you” or “your” shall refer to any individual or entity who accepts this Policy.

**2. Applicability and Scope**

- 2.1. This Policy applies to your information when you visit the Mobile App or use the Services and does not apply to online websites or services that we do not own or control.
- 2.2. Information provided to third parties, shall be controlled by their respective privacy policies. We encourage you to review the privacy policies or notices of other third parties for information about their practices.

**3. Collection of Information**

- 3.1 We collect public and non-public information (i) when you visit our Mobile App; (ii) when you communicate with us via our customer support channels; (iii) when you apply or sign up to and/or use any of our Services; (iv) we collect through third-party service providers and other sources and; (v) through online research on social media and websites, which may not be publicly available.
- 3.2 We collect data on behalf of Synapse, the Participating Depository Institutions, and Digital Currency Service Partners to comply with applicable law and financial services regulation.
- 3.3 We also collect information in order to verify your identity when you apply or sign up to receive a service from us.

#### **4. Types of Personal Data Collected**

- 4.1 The information we collect may vary according to the Service we will be providing to you and your use of the Services:
- 4.2 We may collect the following information about individuals or businesses (“Data”):
  - 4.2.1 Individuals’ Information: name or aliases, physical address, work address, phone number, email address, IP address, date of birth, gender, local tax identification number, result of sanctions screenings, government ID, photo identification, selfie, or video authorization, images of your face on your identification document (e.g., government-issued identification card) and/or video, your biometric facial identifiers, and other additional information you may provide, or additional information we may additionally request you to provide (collectively the “Individual’s Information”);
  - 4.2.2 Business’ Information: entity legal name or aliases, including “doing business as” names, physical address, phone number, legal entity type, industry, organizational documents (e.g. articles of incorporation and bylaws), employer identification number, or other information relating to your authorized signors or beneficial owners, which may include the Individuals’ Information as provided above, or additional information we may additionally request you to provide;
  - 4.2.3 External Bank Account Information: external financial institution name, account name, account type, branch number, account number, routing number, international bank account number (“IBAN”), information, data, passwords, authentication questions, materials or other content, transaction and available balance information;
  - 4.2.4 Financial Data of Your Account With Us: transactions and transaction history, including but not limited to ACH, Wire and card transactions, available account balance, card data, loan and debit amounts, loan types, payment plan, loan balance, linked bank accounts, salary and other income, sources of wealth, and other assets;
  - 4.2.5 Background Check Data: background check information including credit and criminal checks, supporting research, and screenings, to the extent required or permitted by local law;
  - 4.2.6 Recipients’ or Senders’ Data: when you send or request money through the Services, we may collect data such as name, postal address, telephone number, IP address, date of birth, and financial account information about the recipient or sender of the funds. The extent of data required about a recipient or sender may vary depending on the Services you are using to send or request money;
  - 4.2.7 Third-Party Sources: we may obtain information from third-party sources, merchants, recipients and senders of funds, data providers, identity verification providers, and credit bureaus, where permitted by law.
  - 4.2.8 Digital Identity Information:

- 4.2.8.1 Services Metadata: when you interact with the Services, metadata is generated that provides additional context about the way you interact with the Services.
- 4.2.8.2 Log Data: our servers may automatically collect information about your visit to the Mobile App, including IP addresses and associated information, browser type and settings, the date and time the Services were accessed and used, information about browser configuration and plugins, language preferences.
- 4.2.8.3 Device Information: your device “fingerprint” (e.g. hardware model, operating system and version, unique device identifiers and mobile network information) when you access our Mobile App or use a Service.
- 4.2.8.4 Location Information: we may receive information from you that helps approximate your location, such as using an IP address received from your browser to determine an approximate location. Further, we may also collect location information from devices in accordance with the consent process provided by your device.

## **5. Retention of Information**

- 5.1 We retain your information to fulfill our legal or regulatory obligations and for our business purposes. We may retain your Data for longer periods than required by applicable law if it is in our legitimate business interests and not prohibited by law.
- 5.2 If you stop using the Services and close your account, we reserve our ability to retain and access the Data as provided in this Policy. We will continue to use and disclose such Data in accordance with this Privacy Policy.
- 5.3 All Data are stored in encrypted format in Utoppia’s database, or that of Synapse, the Participating Depository Institutions or the Digital Currency Service Partners.

## **6. Purposes of Collection and Use of Information**

- 6.1 We use the information we collect or receive to operate, improve, and protect the Services we provide and to develop new Services. More specifically, we collect and use your information:
  - 6.1.1 To provide the Services, perform obligations under our agreements with third-parties, and carry out related business functions, including performing data and transaction processing, analyzing transaction history to combat regulatory and other security concerns, assisting with the investigation of a dispute, conducting credit checks, handling user inquiries, and managing relationship;
  - 6.1.2 To develop, improve, enhance, modify, add to, and further develop our Services;
  - 6.1.3 To comply with legal obligations and regulations applicable to the Services and to Synapse, the Participating Depository Institutions, and the Digital Currency Service Partners, including but not limited to “know your customer” obligations based on applicable anti-money laundering and anti-terrorism requirements, economic and trade sanctions, customer due diligence, suspicious activity reporting, foreign exchange and international trade, tax reporting and other applicable laws, regulations, ordinances, and obligations or requirements including those related to the Participating Depository Institutions and Digital Currency Service Partners;
  - 6.1.4 For Security and privacy management, to detect, prevent, and investigate privacy and security-related concerns that could impact you, the Mobile App, Synapse, the Participating Depository Institutions, or the Digital Currency Service Partners;
  - 6.1.5 To confirm a person’s authority as a representative or agent of a user;

- 6.1.6 To conduct record keeping and otherwise manage the business;
  - 6.1.7 To verify you, your identity, that the data provided is credible, and prevent fraud;
  - 6.1.8 To protect you, Utoppia, Synapse, the Participating Depository Institutions, and the Digital Currency Service Partners from fraud, malicious activity, and other privacy and security-related concerns;
  - 6.1.9 To provide customer support to you, including to help respond to your inquiries related to our Services or our Mobile App;
  - 6.1.10 To send you technical notices, updates, security alerts and support and administrative messages;
  - 6.1.11 To investigate any misuse of our Services or our Mobile App, including criminal activity or other unauthorized access to our Services;
  - 6.1.12 To defend our legal rights and the rights of others;
  - 6.1.13 To conduct record keeping and otherwise manage our business;
  - 6.1.14 To comply with applicable law or regulations; and/or
  - 6.1.15 For any other purpose with your consent.
- 6.2 We may use raw data or aggregated and anonymized data for the purposes provided in this Policy.
- 6.3 We use machine learning and facial recognition to verify the legitimacy of your identification documents, verify the factualness and credibility of the information you provide to us, and avoid fraud, by, among other actions, comparing biometric data with data previously or separately obtained. Based on the submitted identification document, Utoppia programmatically creates a feature vector of the face displayed in such document and stores it in encrypted format in Utoppia's database. The vector cannot be used to reconstruct the original image. When a new user creates an account, Utoppia programmatically compares that user's vector against others in its database to help detect potential cases of identity theft. As with all Data, Utoppia does not sell or rent the image, likeness, or vector to anyone, including marketers or other third parties, and does not use your Data for commercial purposes other than identity verification, financial loss mitigation, and regulatory compliance.

## **7. Sharing Information**

- 7.1 Utoppia takes your privacy seriously. We may disclose information to marketers or other third parties as permitted by law.
- 7.2 We do share your information with third parties as described in this Policy. We may share some of your information:
  - 7.2.1 With Synapse for the purposes of offering services to you and providing customer service to you. You understand that Synapse may have access to all Data and that Synapse's privacy policy may apply.
  - 7.2.2 With the Participating Depository Institutions and the Digital Currency Service Partners in order to comply with regulation, and bank's regulatory obligations and "know your customer" requirements. You understand that Participating Depository Institutions and the Digital Currency Service Partners may have access to all Data and that the Participating Depository Institutions and Digital Currency Service Partners' applicable data privacy policy or notice shall apply;
  - 7.2.3 With other Financial Services Partners to provide digital currency products and services. You understand that these Financial Services Partners will have access to your Data and that the applicable data privacy policy or notice shall apply.
  - 7.2.4 For our everyday business purposes, such as processing your transactions, maintaining your account(s), or reporting to credit bureaus;

- 7.2.5 With other companies that provide services to us, such as identity verification service providers, fraud prevention service providers, credit bureaus, or collection agencies;
  - 7.2.6 With other parties to transactions when you use the Services, such as other users, merchants, and their service providers. We may share your information with other parties involved in processing your transactions. This includes other users that you are sending or receiving funds from, and merchants and their service providers. This information might include: (i) information necessary to facilitate the transaction, and (ii) information to help other participant(s) resolve disputes and detect and prevent fraud;
  - 7.2.7 To information technology providers or other service providers around the world that act under our instructions regarding the processing of certain data ("Vendors"). Vendors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the information, and to process information only as instructed;
  - 7.2.8 To card networks in case you are issued a card by the Participating Depository Institution or the Digital Currency Service Partners. You understand that the card network may have access to all Data and that the card network applicable data privacy policy or notice shall apply;
  - 7.2.9 To independent external auditors or other service providers around the world. Such service providers will be subject to any necessary contractual obligations regarding the protection and processing of such Data;
  - 7.2.10 In connection with a change of ownership or control of all or part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
  - 7.2.11 To support our audit, compliance, and corporate governance functions;
  - 7.2.12 To service providers to prepare, deploy and analyze advertising content;
  - 7.2.13 For our everyday business purposes, such as processing your transactions and maintaining your account(s);
  - 7.2.14 To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention and risk management;
  - 7.2.15 To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
  - 7.2.16 With your consent or direction.
- 7.3 Subject to applicable law, we may disclose Data if required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from law enforcement or other public authorities wherever Utoppia may do business; (b) protect and defend the rights or property of Utoppia; (c) act in urgent circumstances to protect the personal safety of users, Synapse, Participating Depository Institution, the Digital Currency Service Partners, and contractors/employees of Utoppia or others; or (d) protect against any legal liability. In addition, Utoppia may share your Data with U.S. regulators and with other self-regulatory bodies to which we are subject, wherever Utoppia may do business.

## **8. Protection of your Information**

- 8.1 Utoppia takes commercially reasonable measures to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Additionally, we implement policies designed to protect the confidentiality and security of your nonpublic personal information.
- 8.2 Unless otherwise specified in this Policy, Utoppia limits access to your information to employees that have a business reason to know such information, and further implements

security practices and procedures designed to protect the confidentiality and security of such information and prohibit unlawful disclosure of such information in accordance with its policies.

9. **Cookies and Other Tracking Technologies:**

- a. Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons).
- b. Our Mobile App uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).
- c. Our Mobile App uses Google reCAPTCHA, which is a free service that protects websites from spam and abuse using advanced risk analysis techniques to tell humans and bots apart. Google reCAPTCHA works differently depending on what version is deployed. For example, you may be asked to check a box indicating that you are not a robot or Google reCAPTCHA may detect abusive traffic without user interaction. Google reCAPTCHA works by transmitting certain types of information to Google, such as the referrer URL, IP address, visitor behavior, operating system information, browser and length of the visit, cookies, and mouse movements. Your use of Google reCAPTCHA is subject to Google's [Privacy Policy](#) and [Terms of Use](#). More information as to Google reCAPTCHA and how it works is available [here](#).

10. **International Data Transfers:**

- a. We operate internationally and may transfer information to the United States and other countries for the purposes described in this Privacy Policy. The United States and other countries may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Data can be subject to access requests from governments, courts, or law enforcement according to the laws of those countries.
- b. In addition, depending upon the jurisdiction in which you reside we may rely upon other bases such as consent or contract. To the extent that you agree to our Terms of Service and enter into a contract with us, you acknowledge that the transfer is necessary for performance of that contract.

11. **“Do Not Track” Signals:** Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Mobile App does not currently interpret, respond to or alter its practices when it receives “Do Not Track” signals.

12. **Third Party Links:** The Mobile App and Services may contain links that will let you leave the Mobile App and Services and access another website. Linked websites are not under our control. Except as stated herein, this Privacy Policy applies solely to Data that is acquired on the Mobile App and Services. We accept no responsibility or liability for these other websites.

13. **Security:** We maintain commercially reasonable security measures to protect the Data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Data, we cannot guarantee absolute security.
14. **Access of Services and Mobile App by Children:** The Mobile App and the Services are not directed at children under 16 years of age. We do not knowingly collect Data from children under 16. If a parent or guardian becomes aware that his or her child has provided us with Data without the parent or guardian's consent, he or she should contact us using the information below ("Contact").
15. **Contact:** If you have any questions about this Policy, please contact us by email, telephone, or postal mail.

Email: [support@utoppia.com](mailto:support@utoppia.com)

Telephone: +1 (650) 495-2468

Hours: Customer Service agents are available to answer your calls:

Eastern Time (USA): Monday through Friday: 7:00 AM – 11:00 PM.

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| 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"> <li>• social security number, identification number, and account transactions</li> <li>• payment history and account balances</li> <li>• credit history and transaction or loss history</li> </ul> |
| How?  | All financial companies need to share members' 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 Utoppia, Inc. chooses to share; and whether you can limit this sharing.  |

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|---|-----|----|
| <b>For our everyday business purposes-</b><br>such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | YES | NO |
| <b>For our marketing purposes-</b><br>to offer our products and services to you   | YES | NO |
| <b>For joint marketing with other financial companies</b>   | YES | NO |

|   |     |                |
|---|-----|----------------|
| <b>For our affiliates' everyday business purposes-</b><br>information about your transactions and experiences | YES | NO             |
| <b>For our affiliates' everyday business purposes</b><br>information about your creditworthiness              | NO  | We don't share |
| <b>For our affiliates to market to you</b>  | NO  | We don't share |
| <b>For nonaffiliates to market to you</b>   | NO  | We don't share |

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|--------------------------------------|---------------|
| <b>Who is providing this notice?</b> | Utoppia, Inc. |
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| <b>How does Utoppia, Inc. protect my personal information?</b> | 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.   |
| <b>How does Utoppia, Inc. collect my personal information?</b> | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>● open an account or provide account information</li> <li>● use your credit or debit card or apply for financing</li> <li>● give us your contact information</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p> |
| <b>Why can't I limit all sharing?</b>                          | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>● sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>● affiliates from using your information to market to you</li> <li>● sharing for non-affiliates to market to you</li> </ul>   |

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| <b>Affiliates</b> | Companies related by common ownership or control. They can be financial and nonfinancial companies. |
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| <p><b>Nonaffiliates</b></p>   | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Nonaffiliates we share with can include insurance companies, service providers, co-branded partners, retailers, data processors, membership clubs, companies engaged in selling of consumer products and services, financial services companies, banks, and mortgage servicing companies.</i></li> </ul> |
| <p><b>Joint marketing</b></p> | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• <i>Our joint marketing partners include companies such as financial services companies and other financial institutions.</i></li> </ul>  |