

## PRIVACY POLICY

### 1. INTRODUCTION AND SCOPE

Account Pilot, Inc. ("Account Pilot," "we," "our," or "us") is committed to protecting your privacy and handling your data with transparency and care. This Privacy Policy explains how we collect, use, share, and safeguard your personal information when you use our services.

This policy applies to all users of the Account Pilot platform, including:

- End Users: Individuals who access the Account Pilot mobile or web application to create a financial plan, link accounts, and receive personalized guidance.
- Client Users: Employees or representatives of participating financial institutions who access the Account Pilot platform in a support or administrative capacity.
- Visitors: Individuals who access Account Pilot's marketing website or informational resources but do not create an account.

This Privacy Policy governs the use of information collected through:

- The Account Pilot mobile and web applications;
- Co-branded implementations of Account Pilot with participating credit unions or banks;
- Integrations with third-party data providers, including account aggregation services such as Plaid;
- Email, text (SMS), or in-app communications;
- Account Pilot's support and administrative systems.

By using our services, you agree to the practices described in this Privacy Policy. If you do not agree with the terms of this Policy, you should not use the platform or associated services.

Note: This Privacy Policy is separate from any privacy practices maintained by your financial institution. For questions related to your credit union or bank's use of your data, please refer to their privacy policy directly.

If you have questions about these Terms, you may contact us at [legal@accountpilot.com](mailto:legal@accountpilot.com).

### 2. TYPES OF DATA COLLECTED

We collect the following categories of information when you use the Account Pilot platform, whether through a co-branded credit union implementation or a direct-to-consumer offering. Account Pilot collects information that falls into the following general categories:

#### 2.1. Information You Provide

- We collect the information you provide directly when you:
- Create or manage an Account Pilot profile (e.g., name, email address, phone number, password);
- Link external bank or credit union accounts via secure third-party data providers;
- Set financial goals or preferences (e.g., savings targets, payment priorities);
- Contact customer support or participate in surveys or feedback programs.

## **2.2. Financial Account Information**

When you connect your financial accounts (e.g., checking, savings, loan, or payroll accounts) using third-party services like Plaid, we may access:

- Account balances and transaction history;
- Income deposits, recurring bills, and payment schedules;
- Account type, institution name, and masked account numbers.

This information is used solely for the purpose of building and maintaining your financial plan. Account Pilot does not store your actual login credentials—only secure access tokens provided by the aggregation partner.

## **2.3. Usage and Device Information**

We automatically collect certain information about your interactions with the platform, including:

- Device type, operating system, browser type, and IP address;
- Timestamps of login and logout sessions;
- Interactions with key features, such as linking accounts, updating financial goals, modifying budget plans, viewing alerts, or completing plan steps;
- In-app navigation patterns and button interactions;
- System performance metrics, such as loading errors or crash reports.

This information helps us understand how the Platform is used, diagnose issues, and improve both functionality and user experience to support future product development.

## **2.4. Communication Preferences and Interactions**

We collect information about how you interact with messages sent by Account Pilot (e.g., email opens, notification clicks). We also log preferences related to alert delivery (email, push notifications, etc.).

## **2.5. Information Provided by Client Users**

If you are a Client User (e.g., credit union employee), we may collect:

- Your name, work email address, and associated branch or role;
- Support activity logs (e.g., interactions with End User data via the admin portal);
- Notes or suggestions provided through training, support, or feedback sessions.

All use of End User information by Client Users is governed by role-based permissions and applicable privacy and security protocols.

## **3. HOW WE USE YOUR DATA**

We use the information we collect to deliver, support, and continuously improve the Account Pilot Platform. The data we collect enables us to provide you with a personalized financial experience, maintain platform security, and fulfill our obligations to you and our institutional partners. Specifically, your data may be used to:

### **3.1. Provide and Maintain the Service**

- Build, update, and maintain your financial plan based on real-time account data

- Detect income changes, forecast obligations, and deliver timely plan adjustments
- Ensure account authentication, linked account integrity, and secure session management
- Fulfill requests for specific features or services within the Platform

### **3.2. Personalize Your Experience and Support Communication**

- Send alerts, reminders, and service-related messages relevant to your plan
- Customize notifications and recommendations based on your goals and preferences
- Respond to customer service inquiries and provide support

### **3.3. Market Products and Services that Align with your Goals**

- Communicate new features, partner services, or tools we believe may interest you
- Offer relevant promotions based on your usage patterns or plan status

Note: You may opt out of non-essential marketing communications at any time.

### **3.4. Improve the Platform**

- Analyze aggregate behavior to enhance product design, functionality, and user experience
- Conduct research, pilot testing, or usability studies to improve financial outcomes for users
- Evaluate how features perform across different user groups

### **3.5. Ensure Platform Integrity, Safety, and Legal Compliance**

- Detect, prevent, and address fraud, unauthorized use, or other criminal activity
- Monitor for system abuse, enforce our Terms of Service, and comply with applicable laws
- Investigate and resolve platform bugs, errors, or outages

### **3.6. Generate Aggregated and De-Identified Insights**

- Analyze trends across anonymized user cohorts to improve system intelligence
- Share high-level usage patterns with our institutional partners to better understand member needs
- Use de-identified data for business analytics, research, and strategic planning

### **3.7. Support Corporate Governance and Business Continuity**

- Enforce contractual agreements, including terms of service and policies
- Comply with legal obligations, regulatory inquiries, and law enforcement requests
- Transfer data as part of a merger, acquisition, bankruptcy, or sale of assets, in accordance with applicable law and notice requirements

## **4. SHARING AND DISCLOSURE**

We take your privacy seriously. Account Pilot does not sell your personal information. We only share your data under limited circumstances to deliver our services, comply with legal obligations, or improve your experience—always with safeguards in place.

### **4.1. With Your Financial Institution (if applicable)**

If you access Account Pilot through a participating credit union or other financial institution, certain insights and account-related data may be shared with that institution to:

- Support customer service and member engagement;
- Provide coaching, support, or outreach based on financial activity and plan usage;
- Generate reports or dashboards about overall member engagement or service eligibility.

Note: We do not share your raw transaction data unless explicitly authorized or configured by your institution. All access is role-based and subject to audit and compliance protocols.

#### **4.2. With Third-Party Service Providers**

We engage carefully selected service providers to help us deliver, improve, and secure the Platform. These include:

- Data aggregation providers (e.g., Plaid, Yodlee);
- Hosting and cloud infrastructure providers;
- Customer support platforms and communication tools;
- Analytics or bug-tracking services.

These providers are bound by contractual obligations to handle your information securely and only for the purpose of performing their services.

#### **4.3. With Your Consent**

We may share information with third parties at your direction, such as when you explicitly connect a new institution or opt in to a referral, promotional offer, or feature integration.

#### **4.4. For Legal, Security, and Compliance Purposes**

We may disclose your information if we believe it is necessary to:

- Comply with legal obligations, subpoenas, or regulatory requests;
- Enforce our Terms of Service or investigate violations;
- Prevent or respond to fraud, security incidents, or potential harm to individuals or property;
- Cooperate with law enforcement or government authorities, as permitted by law.

#### **4.5. Business Transfers**

If Account Pilot is involved in a merger, acquisition, restructuring, financing, or sale of assets, your information may be transferred as part of that transaction. We will take steps to ensure the confidentiality of your personal data is maintained and will notify you of any material changes to privacy practices.

#### **4.6. Aggregated or De-Identified Information**

We may share aggregated, anonymized, or de-identified data with third parties for research, benchmarking, or industry analysis. This data cannot be used to identify you personally.

### **5. RETENTION AND DELETION**

We retain personal information only as long as necessary to provide the Account Pilot services, fulfill contractual and legal obligations, resolve disputes, enforce our agreements, or support internal business operations.

#### **5.1. End Users**

For End Users, we retain your profile, linked account metadata, budgeting plans, support history, and related information for the duration of your use of the Platform. After account closure:

- Most personal financial data will be deactivated or deleted within one year;
- Certain anonymized or aggregated data may be retained indefinitely to support system performance and product development;
- We may retain limited data for longer periods if required by law or to protect our rights (e.g., transaction logs, audit records, legal holds).

## **5.2. Client Users**

For Client Users affiliated with credit unions or financial institutions:

- Your user profile, system access logs, and support activity may be retained for as long as your institution's agreement with Account Pilot remains active or as otherwise required under internal policies or regulatory obligations.

## **5.3. Deletion Requests**

You may request deletion of your personal information at any time by contacting us at [privacy@accountpilot.com](mailto:privacy@accountpilot.com) or using in-app tools, if available. We will comply with such requests in accordance with applicable laws, subject to any required retention for compliance, legal, or contractual purposes.

Please note: Account Pilot does not control data retained independently by your credit union or other partner institutions. For requests relating to those entities, please contact them directly.

## **6. USER RIGHTS**

Depending on your relationship with Account Pilot and applicable laws, you may have certain rights regarding your personal data. We honor these rights to the extent required by law and in ways consistent with the design and intent of the Platform.

### **6.1. Access and Review**

You may request a copy of the personal data we hold about you, including data related to your financial plan, linked accounts (as available through third-party providers), and profile information. We will provide this data in a commonly used electronic format unless another format is required.

### **6.2. Correction and Updates**

If you believe any information in your Account Pilot profile is inaccurate or outdated, you may update it directly in the app or by contacting our support team. For security reasons, we may ask you to verify your identity before making changes.

### **6.3. Deletion and Account Closure**

You may request deletion of your data or closure of your account at any time. See Section 5 ("Retention and Deletion") for more detail on how we handle such requests.

### **6.4. Communication Preferences**

You may opt out of promotional communications at any time by clicking “unsubscribe” in an email or contacting us. Note: opting out of service-related alerts (e.g., plan updates or risk warnings) may limit the functionality of your Account Pilot experience.

## **6.5. Limitations**

Some rights may not apply in all circumstances or may be subject to limitations. For example:

- We may retain certain information for legal compliance, fraud prevention, or recordkeeping;
- We cannot access or modify data held solely by your financial institution;
- Requests that would require disproportionate technical effort or jeopardize others' privacy may be denied.

To exercise your rights, contact us at [privacy@accountpilot.com]. We will respond within a reasonable timeframe and in accordance with applicable laws.

## **7. COOKIES AND TRACKING**

Account Pilot uses cookies and similar technologies to improve the functionality, security, and performance of the Platform. This section explains how we use these tools and your choices regarding them.

### **7.1. What Are Cookies?**

Cookies are small text files placed on your device when you visit a website or use a web-based application. They help websites remember your actions, preferences, and session information, and can improve security and efficiency.

### **7.2. Types of Cookies We Use**

We may use the following types of cookies on the Account Pilot Platform:

- Essential Cookies: Required for core site functionality (e.g., maintaining session state after login).
- Performance Cookies: Help us understand how users interact with the Platform (e.g., which pages are visited and how long users stay).
- Functional Cookies: Remember your preferences, such as language or region settings.
- Security Cookies: Support fraud prevention and account protection.
- Analytics Cookies: Allow us to gather anonymized data on usage patterns and performance metrics to improve the product.

Account Pilot does not currently use cookies for third-party advertising or behavioral targeting.

### **7.3. Web Beacons and Similar Technologies**

In addition to cookies, we may use small graphic images known as web beacons (also called “pixel tags” or “clear GIFs”) in emails or on the Platform. These help us track engagement (e.g., whether a user has opened an email or visited a particular feature).

### **7.4. Your Choices**

Most browsers allow you to control cookies through settings that let you:

- Accept or reject all cookies;
- Accept only certain types of cookies;

- Delete existing cookies;
- Notify you when a cookie is being set.

Please note that disabling certain types of cookies may impact the functionality of the Platform, including your ability to stay logged in or access certain features.

### **7.5. Do Not Track (DNT)**

Your browser may offer a "Do Not Track" setting. The Account Pilot Platform does not currently respond to DNT signals, but we respect your privacy and only use tracking mechanisms consistent with this Privacy Policy.

## **8. DATA SECURITY**

Account Pilot takes data security seriously and implements safeguards designed to protect your personal and financial information from unauthorized access, use, alteration, or disclosure.

### **8.1. Security Measures**

We employ a combination of administrative, technical, and physical security measures to help protect your data. These include:

- Encryption of sensitive data in transit using industry-standard TLS protocols;
- Role-based access controls and authentication protocols;
- Secure cloud infrastructure hosted by reputable third-party providers;
- Continuous monitoring for unusual activity or known vulnerabilities;
- Regular security audits and penetration testing;
- Mandatory security training for employees and contractors who have access to user data.

### **8.2. Third-Party Security Standards**

When we work with third-party service providers—such as data aggregation partners or cloud hosting vendors—we require them to adhere to strict data security obligations consistent with applicable laws and contractual requirements.

### **8.3. User Responsibilities**

Security is a shared responsibility. To help protect your data:

- Use a strong, unique password and change it periodically;
- Keep your login credentials confidential and secure;
- Log out after accessing the platform from a shared or public device;
- Promptly notify us if you suspect unauthorized access to your account.

### **8.4. No Absolute Guarantee**

While we follow industry best practices and work hard to safeguard your information, no system can guarantee complete security. We cannot guarantee that your information will never be accessed, disclosed, altered, or destroyed by a breach of any of our technical or organizational safeguards. In the event of a data breach affecting your personal information, we will notify you in accordance with applicable laws.

## **9. CHANGES TO THE PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons.

When we make material changes, we will:

- Post the revised version on our website or app with an updated “Last Updated” date at the top of the page;
- Provide additional notice as required by applicable law, which may include sending an email notification or displaying a banner within the Account Pilot platform.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information and how you can manage your privacy preferences.

Your continued use of Account Pilot after the effective date of any updates constitutes your acceptance of the revised Privacy Policy.

## **10. CONTACT INFORMATION**

If you have any questions, concerns, or requests related to this Privacy Policy or your personal data, you may contact us at:

Account Pilot, Inc.

Attn: Privacy Team

821 East Washington Avenue Suite 200

Madison, Wisconsin 53703

Email: [privacy@accountpilot.com](mailto:privacy@accountpilot.com)

We will respond to inquiries or requests in accordance with applicable privacy laws and aim to address your concerns promptly and thoroughly.

## **Copyright Notice**

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