

# Concerto Card Company Online Privacy Policy

Effective April 30, 2023

## 1. Overview

This Privacy Policy explains how and why Concerto Card Company (referred to herein as “Concerto,” “we,” “us,” or “our”) collects, stores, uses, and shares personal information when you visit our website (“Online Services”). The terms “you” or “your” refer to any individuals who access or use the Online Services. The term “account” means the credit card account issued by a financial institution and accessed through the Online Services. By using our Online Services, you consent to this Privacy Policy in full.

## 2. How does Concerto collect information when you use Online Services?

We collect information in a variety of ways. For example, we may collect information:

- Directly from you. We may collect information you share when you sign up for email updates or use our Online Services to access and service your account, communicate with us, respond to surveys, or provide feedback.
- Automatically when you use our Online Services. We may collect information about your device, your mobile or online activity, IP address, and other information when you use our Online Services. This information may be collected through our server logs, cookies, web beacons, or other analytics tools.

## 3. What information does Concerto collect?

Depending on how you use the Online Services, we may collect various types of information. For example:

- **Contact or identity data.** Personal and/or business identifying information such as name, address, email, phone number, date of birth, government-issued identifier (e.g., Social Security number, tax ID number, driver’s license, or other government ID), username and password, and other information that directly identifies you and/or your business or demographic data such as age, income, and occupation.

- **Account-related data.** Account number, account history, account balances, business-related information, payment or transaction date, and other information related to your account.
- **Device data.** We may collect information specific to the device used to access Online Services, such as the device type, web browser type and version, operating system type and version, display/screen settings, language preferences, internet protocol (IP) address, mobile network information, general location, cookie IDs, device IDs, mobile advertising IDs (e.g., Apple’s IDFA or Google’s Advertising ID), and likely connections among different browsers and devices that you use.
- **Online activity data.** Information about how you use and interact with our Online Services including login data, search history, content viewed, links clicked, features used, frequency and timing of when you use our Online Services, and the webpage from which you clicked a link to come to our Online Services.
- **Marketing data.** We may collect your marketing preferences and may make inferences based on your interactions with us, our affiliates or other third parties with whom we have a contractual relationship.
- **Communications data.** We may collect your communication preferences and details or the content of your communications with us, including text, email, and chat messages, if applicable.

If you inquire about or apply for a job at Concerto, we may also collect:

- **Employment application data.** Information submitted, uploaded, or included in relation to a job application or inquiry, including professional, employment-related, and education history.

If you disclose any information relating to other people to us or to others when using our Online Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

#### 4. How does Concerto use the information it collects?

We may use the information we collect for various purposes depending on how you interact with us and our Online Services. In general, we may use your information for any legal or business purpose, including:

- Providing, maintaining, and servicing your accounts.

- Processing payments and transactions.
- Verifying your identity and authenticating your login credentials.
- Detecting and preventing fraud and mitigating security risks.
- Advertising and marketing.
- Conducting analytics and research.
- Improving our products and services.
- Responding to civil, criminal, or regulatory lawsuits, subpoenas, or investigations.
- Resolving complaints and disputes, analyzing credit risk, and conducting credit reporting activities on behalf of the financial institution that issued your account.

We may also use or modify the information we collect in a way that will no longer allow us to reasonably identify you. This includes compiling aggregated statistics to understand our customers and usage trends. **Information that has been aggregated and can no longer be linked to a particular individual is not subject to this Privacy Policy.**

## 5. How does Concerto share the information it collects?

We may share your information with:

- **Our business partners.** We may share information with companies that we have contracted with to offer or enhance the Online Services, including the financial institution that issued your account.
- **Service providers.** We may share information with other third parties to provide services on our behalf and to help us operate the Online Services. These third party service providers may collect information on our behalf for our business purposes.
- **Affiliates.** We may share your information with our affiliated companies.
- **Third parties with whom you authorize or direct us to share your information.** We may share information with your consent or at your direction.
- **Credit bureaus.** We may share information with credit reporting agencies, such as Experian and LexisNexis to report on or learn about you in accordance with applicable law.

- **Government entities and others with whom we share information for legal or necessary purposes.** We may share your information with government entities and others if it is necessary or appropriate to comply with applicable law, respond to legal claims and legal processes, such as responding to a warrant, subpoena, governmental audit or investigation, law enforcement request, legal order, or other legal process, to protect our rights, interests, or property, or if we believe in good faith that it is necessary to protect the personal safety of any person or the public.
- **Recipients of aggregated and de-identified information.** We may share aggregated and de-identified information (such as aggregated statistics regarding the use of our Online Services) with third parties for any purpose.

## **6. Does Concerto use online tracking technology (i.e., logs and cookies)?**

Yes. We, along with third-party service providers acting on our behalf, may use online tools and technologies to collect information when you use our Online Services. Information collected includes device data and online activity. We use these tools to collect information for debugging, fraud prevention, session management, and other necessary purposes. We also use these tools to personalize your online experience, target advertising, and conduct analytics. We may associate the information collected using online tools with your account.

Technology we may use includes:

- **Server logs.** Server logs automatically record information and details about your online interactions with us, including information about your visit to our Online Services on a particular time and day.
- **Cookies.** Cookies are small files stored in your web browser by a particular website. Cookies allow websites to store information about your account and preferences and recognize your device during your visit or future visits to the website.
- **Pixel tags.** A pixel tag (AKA web beacon or tag) is a small string of code (or image) that may be placed in a website, advertisement, or email. It allows website owners to set or read cookies or transfer information to their servers when you interact with Online Services.
- **SDKs and mobile advertising IDs.** Our mobile apps may include third-party software development kits ("SDKs") that allow us to collect information about your activity using the mobile app. In addition, some mobile devices include a resettable advertising ID that, like

cookies and pixel tags, allow us and our service providers to identify your mobile device for advertising purposes.

- Third-party plugins. Our Online Services may include plugins from other companies, including social media companies. Third-party plugins are governed by the terms of the companies that created them. These plugins, such as the Facebook “Like” button, may collect information about the pages you visit and share it with the company that created the plugin, even if you do not click on the plugin.

## 7. How does Concerto use online tracking technology?

We, and third-party service providers acting on our behalf, may use online tracking technology to conduct personalization, analytics, and targeted advertising on or through the Online Services.

- **Personalization.** We may use the information we collect about you online, and may link to information about your account, to customize content and advertisements for our products and services on our own and third-party websites and mobile apps. We may also use online tracking technologies to recognize your device when you’re logged in, in order to enable enhanced features or functionality and improve usability of our Online Services.
- **Analytics.** These tracking technologies may be used for data analytics, auditing, research, and reporting on our Online Services and to measure the effectiveness of our advertising.
- **Targeted advertising.** We and our third-party service providers may collect information about your activities using our Online Services and across different websites, mobile apps, and devices over time for targeted advertising purposes. We or our service providers may then show you ads, including across the internet and mobile apps, and other devices, based in part on the information that has been collected.

Targeted online advertising is different than our general advertising. If you opt out of targeted advertising using your browser or by clicking on the advertising options in the ad, you may still receive our general advertising. Opting out of online targeted advertising uses information stored in your browser or device and will apply only to the specific browser or device from which you opt out. You may need to opt out separately on all of your browsers and devices. If you delete your browsing history or cookies, change web browsers, reset your mobile advertising ID, or use a different device, you may need to opt out of online targeted advertising again.

## 8. May you opt out of certain online tracking technologies?

You can manage cookie preferences and opt out of having cookies and other similar collection technologies used by adjusting the settings on your web browser. If you do not want cookies stored on your computer, you can change the settings on your browser to notify you when a cookie is about to be saved or block cookies entirely. How to access these settings, which settings are available, and how to turn on these settings varies by browser type and we encourage you to further investigate your browser's privacy settings if you wish to opt out or adjust these settings in any way. If you choose to decline or block cookies, you may not be able to fully access all of the interactive features of our Online Services.

You can opt out of a third-party service provider's use of cookies, web beacons, and similar technologies by visiting the [Network Advertising Initiative opt-out page](#), or learn more about your choices for limiting or disabling these tools by visiting <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/>.

You cannot decline web beacons; however, setting your browser to decline cookies or to prompt you for a response, or installing an ad-blocker, may keep web beacons from tracking your activity.

## **9. Children and International Users**

We do not knowingly contact or collect personally identifiable information from children under the age of 13. Our Online Services are not intended to solicit information of any kind from children under the age of 13. We do not knowingly collect or store information of children under 13, even in aggregate form. It is possible that through fraud or deceit we may receive information pertaining to children under the age of 13. Parents or guardians may report unauthorized use of our Online Services by a child under age 13 by contacting us at [privacy@concertocard.com](mailto:privacy@concertocard.com). If we are notified of unauthorized use by a child under 13, upon verifying the information, we will immediately delete the unauthorized information from our servers and records.

The Online Services are not directed to anyone located outside of the United States, and our Online Services are controlled, operated, and administered by us from our offices within the United States of America. We do not knowingly offer Online Services to data subjects outside of the United States or monitor the behavior of persons (data subjects) located outside of the United States. By using or continuing to use Online Services, you are confirming that you are located within the United States and agree that you will not provide personal information on, or otherwise use, the Online Services if you are located outside of the United States. While we do not knowingly solicit, collect, or store the personal information of international users, through fraud, deceit, or other unauthorized or inadvertent disclosure, we may receive personal information pertaining to

individuals located outside of the United States. If a person located outside of the United States becomes aware that he or she has provided us personal information, as defined in Article 4 of the General Data Protection Regulation (GDPR), please contact us at: [privacy@concertocard.com](mailto:privacy@concertocard.com), and, upon verifying the information, we will immediately delete the unauthorized information from our servers and records.

## 10. Notice to California Residents

California residents who provide personally identifiable information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing purposes. We will not share your information with third parties for their direct marketing purposes.

**California Consumer Privacy Act (CCPA):** Under the CCPA, covered businesses that collect the personal information of California residents must provide notice regarding their data collection and sharing practices. In addition, the CCPA provides California residents the right to make certain requests with respect to their data.

In the following CCPA Disclosure, the words “we,” “us,” and “our” refer to Concerto Card Company, and the terms “you” and “your” refer to California residents who use our website. The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Disclosure does not apply with respect to personal information that we collect about California residents in connection with providing our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (GLBA)).

### California Privacy Rights

#### Personal Information We Collect.

We may collect the following categories of personal information:

- (i) Identifiers such as your name, address, telephone number, Internet Protocol address, email address, driver’s license number, social security number, employment history, signatures, or other similar identifies.
- (ii) Certain personal characteristics, such as your gender, age, race, color, national origin and marital status.
- (iii) Internet activity information, such as your browsing history, search history, or your interactions with our website or the Grow Credit mobile application.
- (iv) Geolocation data.
- (v) Professional or employment-related information.

We collect your personal information using various sources, including your interactions with our website, the information you provide to apply for a product or service, and information obtained from cookies, pixel tags, web beacons, server logs, or other similar technologies. We collect your personal information to provide the products or services requested by you, to contact you regarding our products and services, and to otherwise enhance your experience with us. As disclosed in our Privacy Policy, we may share your personal information for our everyday business purposes (such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus) and for our marketing purposes to offer our products and services to you. We may also share information about your transactions and experiences with us with our affiliates for their everyday business purposes.

### **Your Right to Make Requests.**

California law permits residents of California to request certain details about how their information is collected, disclosed, and sold to third parties.

Under the CCPA, California residents have the right to:

- Request that a business delete any personal information about the consumer which the business has collected from the consumer.
- Request that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:
  - The categories of personal information that it has collected about that consumer.
  - The categories of sources from which the personal information is collected.
  - The business or commercial purpose for collecting or selling personal information.
  - The categories of third parties with whom the business shares personal information.
  - The specific pieces of personal information it has collected about that consumer.
- Request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to the consumer, free of charge, the following:
  - The categories of personal information that the business collected about the consumer.
  - The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
  - The categories of personal information that the business disclosed about the consumer for a business purpose.
- Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

We do not sell your personal information to third parties or disclose your personal information to third parties for a business purpose. To exercise any of your other rights above, you may contact us by calling us toll-free at 1-833-388-2141 or by emailing us at [privacy@concertocard.com](mailto:privacy@concertocard.com). We may request up to three pieces of personal information about you when you make a request to verify your identity. Only you, or an authorized agent acting on your behalf, may make a verifiable consumer request related to your personal information. To use an authorized agent to submit a request to us, you must (i) provide the authorized agent signed permission to make a request on your behalf; (ii) verify your identity with



us; and (iii) directly confirm with us that you provided the authorized agent permission to submit the request.

We will verify your consumer request by comparing the information you provide to us against our records, which may include requesting that you provide us with your name, address, and phone number.

You have the right not to be discriminated against for your exercise of the privacy rights conferred by the CCPA. We will not discriminate against a consumer because the consumer exercises any of the consumer's rights as described in this CCPA Disclosure. However, we reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified, to the extent your rights adversely affect the rights and freedoms of others, or where the CCPA allows us an exemption, such as when we are required to comply with federal, state, or local laws.

### **11. Can Concerto change this Privacy Policy?**

We reserve the right to change this Privacy Policy at any time without advance notice to you. Each time any content in our Privacy Policy changes, we will update the effective date on the Privacy Policy available through our Online Services. Your use of the Online Services after the effective date constitutes your consent to be subject to our then-current Privacy Policy. We encourage you to periodically review our Privacy Policy for continued use of our Online Services.

### **12. Contact Us.**

If you should have any questions or concerns about our privacy practices, please contact us 1-833-388-2141 or by emailing us at [privacy@concertocard.com](mailto:privacy@concertocard.com).