



Last Revised: August 30, 2021

Bilt Technologies, Inc. General Privacy Policy

Bilt Technologies, Inc. and its affiliates ("Bilt", "we", "our" or "us") respect your privacy and are committed to protecting it through our compliance with this policy.

This General Privacy Policy describes the ways we may collect, use, and disclose your personal information in connection with products and services offered through Bilt (collectively, the "Bilt Services"). Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using Bilt's website, you agree to this privacy policy. This policy may change from time to time, as described herein. Your continued use of the Bilt website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

If you have any financial product or service with us, including Bilt Rewards (defined below), we will use and share any Non-Public Information ("NPI") as defined by the Gramm-Leach-Bliley Act ("GLBA") that we collect from or about you related to your use of that product or service in accordance with our GLBA Privacy Notice.

Furthermore, you acknowledge that the use of any credit card offered by Evolve Bank & Trust ("Evolve"), through Bilt (a "Bilt Rewards"), is governed by the Cardholder Agreement that is provided to you.

If you have any questions about our General Privacy Policy or how it applies to specific data, please contact us at support@biltrewards.com. We will make every effort to resolve your concerns.

What Does This General Privacy Policy Cover?

This General Privacy Policy covers the treatment of personally identifiable information ("Personal Information") we gather when you use or access the Bilt Services, and any Personal Information shared between us and any third party, including Evolve or service providers (collectively, "Third Parties") for use in connection with Bilt Services. By using Bilt Services, you hereby authorize us to review and share your information (including Personal Information) with Third Parties.

When Bilt shares your personal information with vendors and other third party service providers ("Third Party Service Providers") who perform functions on our behalf, we contractually require the Third Party Service Providers to keep your personal information confidential and use it only for the purposes for which we disclose it to them, in compliance with applicable laws and regulations.

This General Privacy Policy does not apply to Third Party Service Providers that you elect to access through the Bilt Services or that you share information with directly. While we attempt to facilitate access only to those Third Party Service Providers that



share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Service Providers. We encourage you to carefully review the privacy policies of any Third Party Service Providers you access.

What Information Do We Collect and How Do We Use the Information?

The information we gather enables us to personalize, improve and continue to operate the Bilt Services. Below we describe in more detail the type of information we collect and how we use it.

Bank Account Information:

Registered users of Bilt Services may provide us with access credentials (for example, username and password) that allow us to gain online access to one or more accounts that you maintain with a third-party financial institution and that you choose to designate for use in connection with Bilt Services (each, an “Authorized Bank Account”). We work with one or more Third Party Service Providers that will securely store, consistent with current industry standards, any Authorized Bank Account access credentials that you provide on Bilt Services and will access your Authorized Bank Accounts solely for the purposes of providing and improving Bilt Services. You may only provide account access credentials for and authorize us to access valid accounts that you hold in your own name. You may not provide access credentials for an account that is held by a third person. You must update your Bilt information to reflect any change to the username or password that is associated with any Authorized Bank Account.

If you choose to link your Authorized Bank Account, you authorize the use of this information to facilitate the Bilt Services. This authorization will remain in effect until you notify us that you wish to revoke this authorization, which may affect your ability to receive the Bilt Services. The Third Party Service Providers that we work with includes, without limitation, Plaid Inc. (“Plaid”). By using our Services, you grant us, Evolve, CardWorks and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy (<https://plaid.com/legal/>)

Sources of Personal Information:

If you create an account and apply for a Bilt Service or otherwise provide your contact information to us, you will provide us with Personal Information that may include your name, username, password, email address, home address and phone number. By providing us with your phone number, you authorize us to contact you via text message (SMS) at that phone number, and you hereby consent to the receipt of such messages. You may opt-out of receiving most of these messages at any time by sending us a request at support@biltrewards.com. You acknowledge that opting out of receiving text messages may impact your use of the Bilt Services. More generally, we may use your contact information to send you messages about the Bilt Services. You may unsubscribe from some of these messages through your Bilt account settings, although we reserve the right to contact you when we believe it is necessary, such as for account recovery purposes. In addition, as part of the Bilt Rewards application



process, you may be asked to provide additional information, such as your social security number, date of birth and employment, address and income history.

Payment Information:

When you make payments through the Bilt Services, we or Fiserv, our third party payment processor, may collect information related to your payments, such as your payment method, account number, type, or expiration date. The use and storage of such information is governed by this General Privacy Policy.

Web Browser Information:

We automatically receive and record information from your web browser when you go on our website, including your IP address and cookie information. We use this information to fight fraud (including spam or malware) and also to analyze your interaction with the Bilt Services (e.g., what links you click on).

Generally, the Bilt Services automatically collect usage information, such as the number and frequency of visits to the Bilt Services. We may use this data in aggregate form, but not in a manner that would identify you personally. This type of aggregate data enables Bilt and authorized third parties to determine how often individuals use the Bilt Services so that we can analyze and improve such Services.

Bilt Offers; Transaction Data:

Notwithstanding anything to the contrary in Bilt's Privacy Policy, if you are enrolled in Bilt Services, Bilt and its Third Party Service Providers may use and share information about the transactions you conduct using your Bilt Rewards ("Transaction Data") solely as follows:

- To confirm (i) a specific transaction occurred; (ii) the award of discounts from a participating merchant; or (iii) the date and amount of your purchase and the last 4 digits of your credit card number so a merchant can verify your purchase in the event of a missing or disputed transaction; and
- To provide participating merchants or Third Party Service Providers with aggregated and anonymized information relating specifically to registered card activity solely to allow participating merchants and Third Party Service Providers to assess the results of their campaign or to create a record of the Transaction Data and thereafter maintain and use data in connection with operating the Bilt program;
- To conduct analysis for the improvement and optimization of Bilt Services; and
- To respond to a request from a government or other regulatory authority or a payment organization involved in a transaction with you or a merchant.

By being enrolled in Bilt Services, you authorize the sharing, exchange and use of Transaction Data described herein by and among Bilt, Third Party Service Providers, payment card networks, and merchants. If you wish to opt out of Bilt Services, please email us at support@biltrewards.com.

**Email, SMS, and Push Notification Communications:**

We may communicate with you about our products and services using email, SMS or other text messages (collectively, “Text Messages”) or push notifications. When we communicate with you via email, Text Message or push notifications, we may collect information regarding such communications, such as confirmation when you open an email, read a text message or receive a push notification. We use this information to operate and improve our customer service and other Bilt Services. Some services such as near real-time alerts from Bilt Services require notifications to be enabled. If at any time you do not wish to receive the benefit of such services, you can turn off notifications using the functionality made available in the browser, application or device settings. Please note that turning off notifications may impact your Bilt experience.

Information We Receive from Third Parties:

We may collect information about you from third parties that perform services and analytics for us. Such companies may include credit bureaus, data providers, fraud detection services and data analytics providers, as well our Third Party Service Providers and their partners.

Information We Receive from Browsers:

Cookies are pieces of text that are stored on your computer or device when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit and use the Bilt Services.

Most browsers have an option for turning off the cookie feature, which, depending on your browser, may prevent your browser from accepting new cookies or allow you to choose whether to accept each new cookie. We recommend that you leave cookies active, because they enable you to take full advantage of the Bilt Services’ features.

Information Related to Advertising and the Use of Web Beacons; Interest-Based Advertisements:

We may serve advertisements, and also allow third party digital marketing partners, including third party advertising servers, advertising agencies, advertising networks, advertising exchanges, advertising vendors and research firms, to serve advertisements through the Bilt Services. These advertisements, which may be both for our own products and services and for third party products and services that we think might be of interest to you, may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Internet-Based Ads (including Personal Information) may be provided to us by a user or derived from the usage patterns of particular users on the Bilt Services and/or services of Third Party Service Providers. Such information may be gathered through tracking users’ activities across time and unaffiliated properties. To accomplish this, we or our service providers may deliver a pixel (known as a “web beacon”) from a digital marketing partner to you through the Bilt Services. Web beacons allow our digital marketing partners to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable our digital marketing partners to serve targeted advertisements to you when you visit other websites, and to view, edit or set their own cookies on your browser, just as if you had requested a web page from their



site.

We do not provide Personal Information to any digital marketing partners for use outside of the Bilt Services. We may use analytics service providers to analyze how you interact and engage with the Bilt Services and our advertisements, so we can learn and make enhancements to provide you with a better experience. Some of these entities may use cookies, web beacons and other technologies to collect information about your use of the Bilt Services and other websites, which may include tracking activity across time and unaffiliated properties, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. Information from analytics service providers may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests in the Bilt Services and other websites and better understand your online activity. For example, Google, Inc. (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Bilt Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt out of Google’s use of cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

Through the Digital Advertising Alliance (“DAA”) and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of and greater control over ads that are customized based on their online behavior across different websites. To make choices about Interest-Based Ads from participating third parties, including an option to opt out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA’s or NAI’s consumer opt out pages, which are located at <http://www.networkadvertising.org/choices/> and www.aboutads.info/choices, respectively.

Aggregate and De-identified Information:

We collect statistical information about both unregistered and registered users that is not Personal Information and cannot be tied back to you, your Account or your web browser (“Aggregate and De-identified Information”). Some of this information is derived from Personal Information. Where permissible under applicable laws and regulations, we may use Aggregate and De-identified Information for various business purposes, including, but not limited to, analytics or to develop or improve our services and marketing. We may share this Aggregate and De-identified Information with Third Party Service Providers for their business purposes. Third Party Service Providers may also share with us non-private, aggregated or otherwise non-Personal Information about you that they have independently developed or acquired.

We may also use and share Aggregate and De-identified Information for research, including research conducted by government entities, non-profit entities, and academic institutions. This may involve publishing findings or combining Aggregate and De-



identified Information with other data sets, but such information will not be shared in a way that allows you or any other person to be personally identified.

How, and With Whom, Is My Information Shared?

Information Disclosed for Our Everyday Business Purposes

We share information about you for our everyday business purposes, such as to process your application, assist in underwriting, process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.

Information Disclosed for Bilt Services:

We may provide Transaction Data and other information to the payment card networks, merchants and other partners for use in connection with the program. This information may be Personal Information and NPI, such as your primary account number.

Information Disclosed for Our Marketing Purposes:

We share information about you for our marketing purposes to offer products and services to you.

Information Disclosed Pursuant to Business Transfers:

If we decide to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we (or substantially all of our assets) were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that may be transferred or acquired by a third party. Any acquirer of us or our assets may continue to use your Personal Information as set forth in and in accordance with this policy.

Information Disclosed for Our Protection and the Protection of Others:

We reserve the right to access, read, preserve and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this General Privacy Policy and our Terms of Use, including investigation of potential violations hereof, (iii) detect, prevent or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

Information We Share With Your Consent:

In addition to the disclosures described in this General Privacy Policy, we may also share your information, which may include your Personal Information, in additional ways, subject to your consent.

Is Information About Me Secure?

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and Personal Information will be encrypted using SSL technology.



The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of Bilt's website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. The information you share in public areas may be viewed by any user of the website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your Personal Information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures utilized pursuant to the Bilt Services. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of your information at any time

What Information of Mine Can I Access?

If you are a registered user, you can view information associated with your Account by logging into the Bilt App or by contacting us at support@biltrewards.com. In addition, you can access and delete cookies through your web browser settings, as detailed above.

California Privacy Rights:

This section applies to any California residents about whom we have collected personal information from any source, including through your use of our Website(s), products or services, or by communicating with us electronically, in paper correspondence, or in person (collectively, for purposes of this section only, "you").

As a consumer financial services company, Bilt applies privacy and security protections to your personal information as required by United States federal law, including but not limited to the Gramm-Leach-Bliley Act and the Fair Credit Reporting Act. As such, most of the personal information about you that we may collect and use is exempt from the California Consumer Privacy Act ("CCPA"), with only a relatively small dataset of personal information being subject to the CCPA.

For purposes of this section, "personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer/resident or household. Personal information does not include publicly available information, information that has been de-identified, or information that does not fall within the definition of personal information above.

How We Collect and Use Your Information

The personal information that we collect about you that is not regulated by federal law, and therefore is subject to the CCPA, is collected from third parties that assist us in marketing products and services to you, and is limited to the following categories:

- **Identifiers.** This includes: name; mailing address; email address; telephone number; and IP address; and



- **Information relating to Internet activity or other electronic network activity.** This includes: cookie identifiers; clear gifs (a.k.a. web beacons); mobile advertiser IDs; browser type; internet service provider (ISP); referring/exit pages; operating system; date/time stamp; clickstream data; device platform; device version; and/or other device characteristics including your choice of settings such as Wi-Fi, Bluetooth, and Global Positioning System (GPS).

We may collect or use this personal information to market products and services to you, but we do not and will not sell this personal information or otherwise provide it to third parties or service providers.

Your Privacy Rights

If you are a California resident, you have the following rights under California law with respect to the personal information described in the “How We Collect and Use Your Information” section above, to the extent such information (i) was collected during the 12-month period immediately preceding your request and (ii) is not already subject to privacy and security measures applied under federal law:

- **Right to Know.** You have the right to request the following information from us about our use of your personal information: (1) the specific pieces of personal information that we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which your personal information was collected; (4) the categories of personal information that we have sold or disclosed; (5) the categories of third parties to whom we have sold or disclosed your personal information; and (6) the purpose for collecting or selling your personal information.

- **Right to Delete.** You have the right to request the deletion of your personal information that is collected or maintained by us.

- **Right to Opt-Out of Sale.** You have the right to opt-out of the sale of your personal information by us. However, as stated above, we do not sell your personal information.

- **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights described above.

These rights are subject to various exclusions and exceptions under applicable laws and are also subject to our being able to reasonably verify your identity and authority to make a request. To facilitate this verification, you must provide us with your full legal name and mailing address, and we may need to request further information.

You may also authorize someone to exercise the above rights on your behalf. If you wish to do so, your authorized agent must submit signed permission from you to make a request on your behalf, and we may still verify your identity directly. If we have collected information on your minor child, you may exercise the above rights on behalf



of your minor child. As Bilt Rewards is intended only for individuals ages 18 or older, we do not intentionally collect information about minors.

If you are a California resident and wish to seek to exercise the California privacy rights set forth above, please contact us at support@biltrewards.com.

Under California Civil Code sections 1798.83-1798.84, California residents are also entitled to ask us for a notice identifying the categories of personal customer information that we share with affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to Bilt Technologies, Inc., 31 Bond Street, Floor 6, New York, NY 10012.

How Can I Delete My Account?

If you decide to delete your Bilt account, you can do so by emailing support@biltrewards.com. If you terminate your Bilt account, any association between your account and information we have stored will no longer be accessible through your account. We will continue to store, access, and use information about you and your account in compliance with this General Privacy Policy and as required by any applicable legal or regulatory obligations.

What Choices Do I Have Regarding My Information?

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- You can always choose not to disclose certain information to us, but please note that certain information is required for use of Bilt Services.
- You may request that we remove your bank and financial information, although this may negatively impact your ability to use Bilt Services.
- You can delete your Bilt account. Please note that we will need to verify that you have the authority to delete the account, and we will continue to store and use information we collected in connection with your past account activity.
- You can opt out of certain cookies and tracking technologies. You can learn more about this in the “Information Collected Using Cookies” and “Information Related to Advertising and the Use of Web Beacons; Interest-Based Advertisements” sections above.
- Your browser may offer you a “Do Not Track” or “DNT” option, which allows you to opt out of certain of your online activities over time and across different websites. Bilt does not support Do Not Track requests at this time, which means that we may collect information about your online activity both while you are using the Bilt Services and after you leave our properties, as we describe above.



We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. As stated above, you can opt out of receiving targeted ads from members of the NAI on the NAI's website.

Children's Privacy

The Bilt Services are not intended for use by children. We do not knowingly collect personal information from children under the age of 13 years. If we become aware that a child under 13 has opened an account or otherwise provided us with Personal Information, we take steps to terminate the child's account and delete such information.

What Happens When There Are Changes to this General Privacy Policy?

We may amend this General Privacy Policy from time to time. If we make changes in the way we collect or use information, we will attempt to notify you by posting an announcement on the Bilt Services; however, any changes to the General Privacy Policy are effective as soon as we post them here.

For more information regarding this General Privacy Policy, or if you have any questions or concerns, please contact us at support@biltrewards.com.

Bilt Gramm-Leach-Bliley Act Privacy Notice, rev. 3/28

1. Facts
 - a. WHAT DOES BILT DO WITH YOUR PERSONAL INFORMATION IN CONNECTION WITH YOUR BILT REWARDS ACCOUNT?
2. Why?
 - a. 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.
3. What?
 - a. The types of personal information we collect and share depend on the product or service you have through us. This information can include:
 - Social Security number and transaction history
 - Account balances and payment history
 - Credit history and credit scores

When you are no longer our customer, we continue to share your information as described in this notice.

4. How?
 - a. All financial companies need to share customers' 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 Bilt chooses to share; and whether you can limit this sharing.



| Reasons we can share your personal information | Does Bilt share? | Can you limit this sharing? |
|---|------------------|-----------------------------|
| 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 | Yes | No |
| For our marketing purposes: to offer our products and services to you | Yes | No |
| For our affiliates' everyday business purposes: information about your transactions and experiences | Yes | Yes |
| For joint marketing with other financial companies | Yes | No |
| For our affiliates' everyday business purposes: information about your creditworthiness | Yes | Yes |
| For our affiliates to market to you | Yes | Yes |
| For non-affiliates to market to you | Yes | Yes |
| | | |

- Who is providing this notice? Bilt Technologies, Inc. (“Bilt”)
 - How does Bilt protect my personal information? 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.
- How does Bilt collect my personal information?
 - We collect your personal information, for example, when you
 - Open an account or use your Bilt Rewards
 - Pay your bills or give us your contact information
 - Provide account information
 - We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.



- Why can't I limit all sharing?
 - Federal law gives you the right to limit only:
 - Sharing for affiliates' everyday business purposes—information about your creditworthiness
 - Affiliates from using your information to market to you
 - Sharing for non-affiliates' companies to market to you
- See below for more on your rights under state law.

Definitions:

- Affiliates - Companies related by common ownership or control. They can be financial and non-financial companies.
- Non-affiliates - Companies not related by common ownership or control. They can be financial and non-financial companies.
- Joint Marketing - A formal agreement between non-affiliated financial companies that together market financial products or services to you.
- Other Information - Special Notice For State Residents: We will also comply with more restrictive state laws to the extent that they apply.

Other Important Information:

If you live in Vermont, we will not share information about your creditworthiness with our affiliates for their everyday business purposes unless you consent to that sharing.

If you live in California, we will not share information about you (1) with our affiliates for their own purposes or (2) for joint marketing with other financial companies.