

**ARCHITECT FINANCIAL TECHNOLOGIES INC.  
PRIVACY POLICY**

*Last Updated: May 14, 2024*

This Privacy Policy describes how Architect Financial Technologies Inc., and its affiliates and subsidiaries (collectively, “**Architect**,” “**we**,” or “**us**”) will collect and use, personal information and the circumstances under which we may share this information. This Privacy Policy applies to all visitors to Architect’s website located at <https://www.architect.co> (the “**Website**”), those accessing Architect’s products and services (collectively, our “**Services**”), or when you otherwise interact with us directly, such as through our customer support channels or on social media. We may provide different or additional notices of our privacy practices with respect to certain products or services, in which case such notices will supplement but not supersede this Privacy Policy.

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**COLLECTION AND USE OF INFORMATION**

We may collect the following information about you during your interaction with the Website and/or Services:

Category of Information	Purpose/Lawful basis	Type of Information Collected	Method of Collection
Onboarding, Know Your Client and Account Creation Information	Legal obligation under financial services laws and regulations.	<ul style="list-style-type: none"><li>• Name, email address, phone number, business information such as company name and job title, social security number, birth date, photo ID, country of residence and nationality, national and governmental identification information, and financial, banking or</li></ul>	<ul style="list-style-type: none"><li>• Directly from you or your employer</li><li>• From third parties, e.g. identity verification services, fraud prevention agencies, websites, and other publicly accessible information.</li></ul>

		other payment related details.	
Contact information	<p>Our legitimate interests in:</p> <ul style="list-style-type: none"> <li>• Sending you technical notices, security alerts, support messages and other transactional or relationship messages</li> <li>• Communicating with you about products, services and events offered by Architect and others and provide news and information that we think will interest you (see the “Your Choices” section below for information on how to opt out of these communications at any time)</li> <li>• Sending you information related to your use of our Services, including but not limited to confirmations, receipts, invoices, and customer surveys</li> </ul> <p>To comply with our legal, regulatory and financial obligations.</p>	<ul style="list-style-type: none"> <li>• Name, email address, postal address, phone number.</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you or your employer</li> </ul>
Usage Information	<p>Our legitimate interests in:</p> <ul style="list-style-type: none"> <li>• Providing, maintaining, improving and developing new products and services, including debugging and repairing errors in our Services</li> <li>• Processing transactions</li> <li>• Monitoring and analyzing trends, usage and activities in connection with our products and services</li> <li>• Detecting, investigation and helping prevent security incidents and</li> </ul>	<ul style="list-style-type: none"> <li>• Information related to your use of and interactions with our Services, such as your name, account information, interactions with our Website, and trade activity.</li> <li>• Device information (e.g. data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you or your employer</li> <li>• Automatically</li> </ul>

	<p>other malicious, deceptive, fraudulent or illegal activity and help protect the rights of Architect and others</p> <p>To comply with our legal, regulatory and financial obligations</p>	<p>identifiers, browser type, and app version)</p> <ul style="list-style-type: none"> <li>• Cookies and beacons</li> </ul>	
Communication Information	<p>Our legitimate interests in:</p> <ul style="list-style-type: none"> <li>• Sending you technical notes, security alerts, support messages and other transactional or relationship messages</li> <li>• Communicating with you about products, services and events offered by Architect and others and provide news and information that we think will interest you (see the “Your Choices” section below for information on how to opt out of these communications at any time)</li> <li>• Sending you information related to your use of our Services, including but not limited to confirmations, receipts, invoices, and customer surveys</li> </ul>	<ul style="list-style-type: none"> <li>• Any information included in communications between you and Architect</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>
Employment application Information	<p>Our legitimate interests in assessing and recruiting prospective employees</p>	<ul style="list-style-type: none"> <li>• Name, address, email and phone number</li> <li>• Education and employment history</li> <li>• Any other information provided or recorded with respect to your application</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third parties, e.g. LinkedIn, your references</li> <li>• Derived by us</li> </ul>

Social Media Information	Our legitimate interests in communicating with you about products, services, and events offered by Architect and others.	<ul style="list-style-type: none"> <li>• Any information submitted through social media or other channels</li> <li>• IP address, which page you are visiting on our Services</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From third parties, e.g. social media platforms</li> <li>• Derived by us</li> </ul>
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We do not knowingly collect any information from children of 13 years or younger.

If you make a purchase, we work with third-party payment processors to collect and process your payment information. These include Plaid Inc. and Project Midas, Inc., d/b/a “Orum.”

**DISCLOSURE OF INFORMATION**

We may disclose personal information in the following circumstances or as otherwise described in this policy:

- To business partners with which we work to provide the Services, including the Plaid group of entities.
- To our vendors, service providers, and other third-parties that access personal information in order to perform functions on our behalf.
- To our integration partners.
- In connection with an employment application to verify the information you provide, for example in order to conduct background checks and/or in communication with your referees.
- Where we deem disclosure is necessary in accordance with, or required by, any applicable law or legal process.
- We may disclose personal information if we believe that your actions are inconsistent with, or that you have violated, our Website Terms of Service and/or Services related agreements or any Architect policies.
- To our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- In connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- Between and among Architect and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- With your consent or at your direction.

**TRANSFER OF INFORMATION TO THE UNITED STATES AND OTHER COUNTRIES**

Architect is headquartered in the United States and we have operations and vendors in the United States and other countries. Therefore, we and those that perform work for us may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. Where required by law, we provide adequate protection for the transfer of personal data in accordance with applicable law, such as by obtaining your consent,

relying on the European Commission's adequacy decisions, or executing the latest EU Standard Contractual Clauses or the UK Addendum issued by the UK Information Commissioner's Office (as applicable).

## **RETENTION OF INFORMATION**

We will only retain personal data for as long as we have a legitimate basis for doing so, including for the purposes of satisfying any legal, regulatory, commercial, accounting, or reporting requirements.

To decide on the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will generally retain information relating to business relationships for as long as there is an ongoing relationship and an appropriate period following the end of that relationship. Once we have no legal or commercial reasons to retain personal data, it will be securely deleted or destroyed.

## **YOUR RIGHTS**

If you are located in the United Kingdom, the European Economic Area, certain US states, or any other location with equivalent data protection regimes, you may have certain rights under applicable data protection laws in relation to your personal data.

- **Request access to your personal information.** This right is commonly known as a "data subject access request" and enables you to receive a copy of the personal information we hold on you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This right enables you to have any incomplete or inaccurate information we hold about you corrected. Please keep us informed if your personal information changes during your relationship with us.
- **Request erasure of your personal information.** This right enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process such personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information.** Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, you may exercise this right. You may also object if we ever process your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This right enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing such personal information.

- **Request the transfer of your personal information to another party.** This right enables you to request for your data to be transferred to another party in a portable format.
- **Withdrawal of consent.** If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time.
- **Right to lodge a complaint with a supervisory authority.** You have the right to complain to a supervisory authority about our collection and use of your personal data. For more information, please contact your local supervisory authority.

If you want to exercise any of these rights, please contact us using the contact information below. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We note that where requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may refuse to act on the request.

#### **CALIFORNIA “SHINE THE LIGHT” LAW**

Where businesses disclose personal information of California residents to third parties for their direct marketing purposes, California law requires them to either provide a mechanism to obtain more information about these disclosures from the previous calendar year, or provide a mechanism for California residents to opt out of these disclosures. We do not disclose your personal information to third parties for their direct marketing purposes, so we are not required to provide an opt-out.

#### **YOUR CHOICES**

##### **Account Information**

You may update, correct certain account information, or deactivate your account at any time by contacting us at [privacy@architect.co](mailto:privacy@architect.co). Please note that we may retain certain information as required by law, our regulatory requirements, or for our legitimate business purposes.

##### **Communications Preferences**

You may opt out of receiving promotional emails from Architect by following the instructions in those communications or by emailing us at [privacy@architect.co](mailto:privacy@architect.co). If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

#### **UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect changes to our privacy practices. We encourage you to periodically review this page for the latest information on our privacy practices, and any use of our Website after any updates constitute your acknowledgement that you have read the updated Privacy Notice.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [privacy@architect.co](mailto:privacy@architect.co) or by mail at the following address: Architect Financial Technologies Inc. 1 E Erie St, Suite 525-5211, Chicago, IL 60611.