

Privacy Policy

Introduction

Crescent Financial Inc. and its affiliates ("Crescent," "we," "our," or "us") respects the privacy of your information. This Privacy Notice is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our website ("Site") and the services we offer through our Site (collectively, "Services"). From time to time, we may change this Privacy Notice. If we do, we will post an amended version on this webpage. Please review this Privacy Notice periodically.

This Privacy Notice covers the following topics:

1. [COLLECTING AND USING INFORMATION](#)
2. [COOKIES AND OTHER TRACKING TECHNOLOGIES](#)
3. [THIRD PARTY PROCESSORS](#)
4. ["DO NOT TRACK" SIGNALS](#)
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1. Collecting and Using Information

Personally Identifiable Information We Collect Online

We collect Personally Identifiable Information from you through your use of the Site and Services. "Personally Identifiable Information" is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

We may collect the following Personally Identifiable Information that you voluntarily provide to us on the Site::

- **Create an Account.** To create an account, you will provide us with your first and last name, email address, and a password that you will use for future logins.
- **Secure Account.** To secure your account, we will send a verification email to the email address you provide. For multi-factor authentication, you will also provide us with your phone number, and we will send you a verification code.
- **Enter Your Personal Information.** To finish creating an account, you will provide us with your legal name, residential address, date of birth, and your Social Security number.
- **Identity Verification.** To verify your identity, we will request to access your camera and you will provide a photograph of your driver's license.
- **Receiving Services.** To start receiving services, you will link your account to Plaid. To link your account, you will provide your bank account information, including but not limited to the financial institution name, account name, account type, account ownership, account number, and routing number, and you may also provide your credit card information. Plaid's privacy policy is available [here](#).
- **Refer a Friend.** To refer a friend, you will provide your friend's email address.

We may collect the following Personally Identifiable Information that you voluntarily provide to us on the Site:

- **Join our Waitlist.** To join our waitlist, you will provide us with your email address.
- **Contact Us.** To contact us, you will provide us with your name and email address.

Information as You Navigate Our Site and App

We automatically collect certain Personally Identifiable Information through your use of the Site and App, such as the following:

- **Usage Information.** We collect information such as which of the pages on the Site and App you access, the frequency of access, and what you click on.
- **Device Information.** We collect information about the device you are using, such as hardware model, operating system, application version number, and browser.
- **Mobile Device Information.** In addition to the Device Information listed above, when you access our Site or App via a browser on your mobile device, we collect and aggregate information about whether you are accessing the Site or App via a mobile device or tablet, device type, and carrier.
- **Location Information.** We collect location information from Site visitors on a city-regional basis.

Third Party Information

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, to refer a friend, you will provide the email address of a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Notice.

How We Share Your Personally Identifiable Information

We may share the information that we collect about you in the following ways:

- With service providers who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.). Any such service providers will be under an obligation to us to maintain the confidentiality of your Personally Identifiable Information;
- With Plaid and our funding bank partner for purposes of processing your transactions;
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- To any other person or entity as part of any business or asset sale; and
- To any other person or entity where you consent to the disclosure.

How We Use Your Personally Identifiable Information

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Services and Site and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Process your account registration;
- Place you on our Waitlist;
- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Defend our legal rights and the rights of others;
- Comply with applicable law.

2. Cookies and Other Tracking Technologies

How We Use Cookies on the Site

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, "Cookies"). "Cookies" are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Site and Services to your individual needs;
- Advertise new content and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and

- Recognize when you return to the Site.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Site and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google and other similar companies.

Platform Controls. You can opt out of Cookies set by specific entities by following the instructions found at these links: Google: <https://adssettings.google.com>

Advertising Industry Resources. You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#). For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's Mobile Choices website.

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

Google Analytics

We use 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, App, 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.

How You Can Opt-Out of Cookies on the Site?

Browser settings. Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site. You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org.

3. Third Party Processors

To ensure that your Personally Identifiable Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws. For example, we use Plaid, a banking application programming interface, cloud data storage; payroll processors; accounting software; payment processors; marketing service providers.

4. "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 Site and App do not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.

5. Choices About Your Personally Identifiable Information

Review and Request Changes to Your Personally Identifiable Information

To review or request changes to any of your Personally Identifiable Information, please contact us at support@crescent.app.

Marketing Communications

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at support@crescent.app.

6. Security

We maintain commercially reasonable security measures to protect the Personally Identifiable Information 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 Personally Identifiable Information, we cannot guarantee absolute security.

7. Third Party Links

The Site, App and Services may contain links that will let you leave them and access another website. Linked websites are not under our control. This Privacy Policy applies solely to Personally Identifiable Information that is acquired by us on this Site, App and Services. We accept no responsibility or liability for these other websites.

8. Children's Privacy

The Site, App and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

9. Notice to California Residents

We do not disclose personal information obtained through our Site or Services to third-parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

If you are a California resident under the age of 18 and a registered user of the Services, California Business & Professions Code § 22581 permits you to request and obtain removal of content or information posted on the Services by you. If you wish to make a request, please contact us at support@crescent.app. Please be aware that removal does not ensure complete or comprehensive removal of the content or information posted on the Services by you and there may be legal reasons for denying your request.

10. How to Contact Us

To contact us for questions or concerns about our privacy policies or practices please contact us at support@crescent.app.

11. Supplemental Privacy Disclosures for Customers and/or Users in Certain Countries

If you reside in one of the following countries, the below Privacy Notice also applies to the processing of your personal information. To the extent there is a conflict between the country-specific language below and the provisions above, the below provisions control to the extent of that conflict.

Hong Kong

"Personally Identifiable Information" refers to such data only consisting of the following (and shall include any updated data of the following items from time to time):

- Your full name, including surname, given name and other name;
- Your Hong Kong Identity Card Number;
- Your date of birth;
- Your correspondence address; and
- Your telephone number.

This authorization is given by you to Crescent on its own behalf, and on behalf of, and as agent for, Refinitiv US LLC, and TransUnion Limited together with its affiliate TransUnion Credit Information Services Limited (collectively, "TransUnion") for the following uses of your Personally Identifiable Information:

- The transfer to TransUnion by Crescent, through Refinitiv US LLC and/or Crescent, of your Personally Identifiable Information for verification of your Personally Identifiable Information;
- TransUnion checking if your Personally Identifiable Information is on the databases of TransUnion;
- TransUnion providing the matching result to Refinitiv US LLC and/or Crescent, which may or may not be located inside Hong Kong, without having sent you any copy of the result for your review; and
- Retention of the Personally Identifiable Information for the period necessary.

By submitting this data, you understand the above and you give consent to and authorize Crescent, Refinitiv US LLC and TransUnion to act in accordance with (i) to (iv) above. Further, you acknowledge that the use of your Personally Identifiable Information for the above by Crescent, Refinitiv US LLC and TransUnion shall not be made the basis for any complaint, claim, suit, demand or cause of action or other proceeding against Crescent, Refinitiv US LLC, or TransUnion by you or any third party.