

Varo Bank U.S. Online & Mobile Privacy Policy

Varo Bank, N.A., (“Varo Bank”, “Varo”, “we”, “us”, or “our”) is committed to your privacy. Our goal is to maintain your trust and confidence when handling personal and financial information about you.

This U.S. Online & Mobile Privacy Policy (“Policy”) describes Varo Bank’s online and mobile privacy practices and applies to anyone who visits our websites or Varo Bank branded social media sites or pages, or uses our mobile applications.

Information that you provide to Varo Bank when you apply for or obtain a product or service from us to be used primarily for personal, family or household purposes is also governed by a separate notice entitled ‘Varo Bank U.S. Consumer Privacy Notice’. If you are such an applicant or customer, please refer to that notice for additional information about our privacy practices.

By using this website or our mobile applications, you agree to the terms and conditions of this Policy.

Information We Collect

When you use our website or our mobile applications, we may collect data from you that generally fall into one of two categories:

“Personal Information” - Personally identifiable information you provide to us such as your name, mailing address, email address, telephone or wireless phone number, social security number (used for identification purposes), or other information that identifies you.

“Online/Mobile Activity Data” - Data such as your IP address, your browser type and language, and your display/screen settings; data about how you use our website and how you interact with our website and mobile advertisements; data about your mobile device; advertising identifiers; geolocation data; social media preferences and other social media data; and other data that may be aggregated and/or de-identified (information that doesn’t identify individual consumers/customers).

How We Collect Information

When You Use or Visit Our Website

Varo Bank may collect information about you when you browse our website or use our online services. We may collect Personal Information when you voluntarily provide it to us through forms on our website or in our mobile applications, such as survey forms, bank account or loan applications, contest entries, and login pages for online banking or mobile application access.

Varo Bank may also use cookies and other online tracking devices such as pixel tags and clear GIFs (also known as web beacons) to collect Online/Mobile Activity Data from you depending

on your browser settings. Cookies are small text files that a website's server places on your computer. Cookies provide a means for websites that you visit to track browsing activities conducted with your computer. A Web beacon is a small string of software code that represents a graphic image on a website or email.

Varo Bank may also partner with certain third parties to deliver advertisements and monitor activities on our own website and other websites. Our partners may use cookies, web beacons, and/or other monitoring technologies to compile statistics about website visitors. For example, Varo Bank uses Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in Google's own privacy policy. Google may aggregate data they collect from their various services. You acknowledge and accept that Varo Bank has no control over Google's data collection. We strongly advise you to review Google's privacy policy for details of their data collection practices located at www.google.com/policies/privacy/partners/, or you may want to opt out from Google Analytics please check here <https://tools.google.com/dlpage/gaoptout>

When You Use Our Mobile Apps

Additionally, Varo Bank may collect Online/Mobile Activity Data when you access our mobile applications or use the browser on your mobile device to access our website. For example, if you have enabled location services on your mobile device, we may collect geolocation data from your device.

When You Link Your Varo Account With Other Financial Institutions, Websites Or Apps

If you link your Varo Account with other financial institutions, websites, or apps you expressly give permission for Varo Bank and such other financial institutions, websites, or apps to transfer, store and process your information in accordance with each entity's respective privacy policies. Therefore you are encouraged to read the privacy policies pertaining to such other financial institutions, websites or apps.

When You Use Our Social Media Pages

Varo Bank has official pages on social media websites such as Facebook®, Twitter® and LinkedIn that enable consumers and customers to discuss their experiences with Varo Bank products and services.

We may also partner with companies that operate social media websites through which you may engage with Varo Bank.

When you interact with us on social media websites we may collect information such as your likes, interests, feedback and preferences. When you interact with our partners, you are subject to their terms of use and privacy policies.

We may collect information from our social media partners, but only if you choose to share with them and they, in turn, share such information with us. **Never include sensitive personal, financial or other confidential information such as your Social Security number, account number, phone number, mailing address or email address when posting or commenting**

online. Any posts you make on our official social media pages -- including posts that contain pictures, comments, suggestions, opinions, complaints or Personal Information -- are available to others who use those pages and are subject to the terms of use and privacy policies of the companies that operate the websites on which they appear. Please refer to the policies of those companies to better understand your rights and obligations with regard to such posts. You are also subject to this Policy and our social media guidelines when you visit our official social media pages.

How We Use Information

We may use Personal Information and Online/Mobile Activity Data we have collected for a variety of reasons. For example, we may use this type of data:

- to enable you to apply for and open Varo Bank products or services;
- to verify your identity (such as when you access your account information);
- to prevent fraud and enhance the security of your account or our online services;
- to enable you to use online tools or perform certain online transactions;
- to service and manage your accounts including responding or updating you on inquiries or to contact you about your accounts;
- to provide you tailored content and marketing messages;
- to operate, evaluate and improve our business (including developing new products and services; improving existing product and services; performing data analytics; and performing accounting, auditing and other internal functions);
- to comply with federal, state or local laws; civil, criminal or regulatory; investigations; or other legal requirements; and
- for other purposes that we may specifically disclose at the time you provide or we collect your information.

Updating Your Information

Keeping your account information up-to-date is very important. You may review, or update certain account information by logging into your account online. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the Contact Us option on our site, or call or write to us using the contact information listed on your account statements, records, or other account materials.

Protecting Children's Online Privacy

Varo Bank encourages protection of children's information on the internet. Our website and mobile application are not directed to children under the age of 13. We do not intentionally collect personal information from children under 13 on our website or mobile app and request that these individuals do not provide us with personal information through our website and mobile app. For more information about the Children's Online Privacy Protection Act (COPPA) please refer to the FTC's website at <http://www.business.ftc.gov/privacy-and-security/children%27s-privacy>.

Links

Our website may include links to third-party websites. These third parties are not subject

to this Statement or to the Varo Bank Privacy Notice. Whenever you visit a third-party website, you should review its privacy notice.

Information Security

At Varo Bank, we make your safety and security a top priority and are committed to protecting your personal and financial information. In accordance with applicable laws, regulations, and industry guidance, we maintain physical, technical, and administrative safeguards designed to protect your Personal Information against unauthorized or accidental access, use, disclosure, acquisition, loss, destruction or alteration.

Varo Bank maintains customer authentication procedures to protect your personal information and account from identity theft. These procedures are for your protection. If you suspect a website is pretending to be a Varo Bank website (also known as “spoofing”) do not enter personal information but instead contact us through a phone number you know is associated with your account at Varo Bank, or by emailing privacy@varomoney.com.

Changes to this Statement

This Statement describes Varo Bank’s current online privacy practices. Varo Bank may change its online privacy practices in the future and we may revise this Statement to reflect material changes. This Statement was last revised October 1st 2021, and is effective as of that date.