

Modern Treasury Privacy Policy

Effective date: April 1, 2023

At Modern Treasury, we take your privacy seriously. Please read this Privacy Policy to learn how we treat personal data collected through our website, products or services, when you receive our marketing communications or when you engage with us on social networks (collectively, our "**Offerings**"). By accessing or using our Offerings, you acknowledge that you accept the practices and policies outlined below and consent to our collection, use and sharing of your as described in this Privacy Policy.

You may print a copy of this Privacy Policy by clicking [here](#).

Privacy Policy Table of Contents

- What this Privacy Policy Covers
- Personal Data
- How We Share Your Personal Data
- Tracking Tools and Opt-Out
- Data Security and Retention
- Personal Data of Children
- California Resident Rights
- Exercising Your Rights under the CCPA
- European Union and United Kingdom Data Subject Rights
- Changes to this Privacy Policy
- Contact Information

What this Privacy Policy Covers

Modern Treasury as Controller: This Privacy Policy covers how we treat Personal Data that we collect when you access or use our Offerings in our role as a controller, such as when you visit our website, respond to our marketing, or register for our Offerings. Under privacy laws, "controllers" determine how and why to process personal data (and may also be called "businesses") and "processors" process personal data at the instruction of the controller with which they contract (and may also be called "service providers").

Modern Treasury as Processor: This Privacy Policy does not cover how we treat your Personal Data in our role as a processor to provide our products (such as Payments, Virtual Accounts, Ledgers and Compliance) to our customers. If you are a Modern Treasury customer, your use of our products and our use of your data as a processor is subject to your relevant agreement with Modern Treasury.

Clients of our Customers: If you are a client or end user of a Modern Treasury customer and have questions about privacy or security, please contact the customer directly, as our customer is responsible for their own privacy and data security practices. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

Personnel of our Customers: If you work for a Modern Treasury customer, then your company administers its use of our products and sets its own policies for its users. Your company, as administrator, may access your accounts, restrict or terminate your access to our products, require you to reset your passwords, and take other actions related to your use of our products. Please contact your Modern Treasury organization administrator for more information.

Personal Data

"**Personal Data**" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations.

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties with Whom We Share this Personal Data
Profile or Contact Data	<ul style="list-style-type: none"> ● First and last name ● Title and company affiliation ● Email ● Phone number ● Business and mailing address 	<ul style="list-style-type: none"> ● Service Providers ● Analytics Partners ● Advertising Partners ● Parties You Authorize, Access, or Authenticate ● Banks
Online Identifiers	<ul style="list-style-type: none"> ● Account name and passwords ● Email 	<ul style="list-style-type: none"> ● Service Providers ● Analytics Partners ● Parties You Authorize, Access, or Authenticate (for purposes of

		two-factor authentication)
<p>Payment Data</p> <p>When paying Modern Treasury for its Offerings</p>	<ul style="list-style-type: none"> • Payment card type • Credit or debit card number (see "Payment Processors" below) • Bank account information • Billing address, phone number, and email 	<ul style="list-style-type: none"> • Service Providers (including our payment processing partners)
Commercial Data	<ul style="list-style-type: none"> • History of products purchased from Modern Treasury 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access, or Authenticate
<p>Identity Data</p> <p>For Bank integrations</p>	<ul style="list-style-type: none"> • Name • Date of birth • Tax ID or social security number • Bank account information • Address • Identity verification and Know Your Customer information (e.g., beneficial owner information) 	<ul style="list-style-type: none"> • Service Providers • Banks (certain integrations)
Device/IP Data	<ul style="list-style-type: none"> • IP address • Type of device/operating system/browser used to access the Offerings • Language settings • Mobile device carrier • Radio/network information (e.g., wifi, LTE, 3G) 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Advertising Partners • Parties You Authorize, Access, or Authenticate • Other Users (only applicable for certain business customers)

Web and Email Analytics	<ul style="list-style-type: none"> • Web page and email interactions • Referring webpage/source through which you accessed the Offerings 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners
Audio or Video	<ul style="list-style-type: none"> • Audio or video recordings of conversations or recordings between Modern Treasury support or customer success and customers • Screen recordings of use of sandbox accounts 	<ul style="list-style-type: none"> • Service Providers
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or letters you send us • Customer support and customer success interactions 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access, or Authenticate

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You
 - When you provide such information directly to us.
 - When you register for or use our Offerings.
 - When you voluntarily provide information through responses to inquiries, surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - Automatically when you use the Offerings.
 - Through Cookies (defined in the **Tracking Tools and Opt-Out** section below).
 - If you use a location-enabled browser, we may receive information about your location.

- Public Records
 - We collect certain information from public records and sources, such as social media platforms, publications, consumer reporting agencies, public databases and news sites.
- Third Parties
 - Vendors
 - We may use analytics providers to analyze how you interact and engage with the Offerings or service providers may help us provide you our Offerings or related support.
 - We may use vendors to obtain information to generate leads, create user profiles, or verify your identity or other information.
 - Partners
 - We may receive information from joint marketing partners or other business partners.
 - Parties you authorize, access, or authenticate
 - Some of our Offerings let you connect with other products that you use. When you authorize us to connect with your accounts with other products, we may receive certain Personal Data (e.g., contact data) that we use as described in this Privacy Policy.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

- Providing, Customizing and Improving the Offerings
 - Processing orders or other transactions; billing.
 - Establishing and maintaining your account for our Offerings.
 - Providing you with the Offerings or information you request.
 - Verifying your identity in compliance with sanctions and "Know Your Customer" laws
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Offerings.
 - Improving the Offerings, including testing, research, internal analytics and product development.
 - Personalizing the Offerings, website content and communications based on your preferences.
 - Doing fraud protection, security and debugging.
 - Enabling customers to issue payment orders to Banks.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the "**CCPA**").
- Marketing the Offerings
 - Marketing and selling the Offerings.
 - Showing you advertisements, including interest-based or online behavioral advertising.
- Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Modern Treasury or the Offerings.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.
- Meeting Legal Requirements and Enforcing Legal Terms
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting, and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Modern Treasury, or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.
- To the extent we collect sensitive personal information (as defined in the CCPA) from you, we use it for the purposes described in section 7027(m) of the CCPA regulations and/or do not use sensitive personal information for purposes of inferring characteristics about consumers.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Offerings or perform business functions on our behalf. They include:
 - Hosting, technology, and communication providers.
 - Security and fraud prevention consultants.
 - Professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of professional services they provide to us.
 - Support and customer service vendors.
 - Payment processors.
 - We use third party payment processors to process payment of your fees for our Offerings. Our payment processing partners such as CardConnect and Ordway collect your voluntarily-provided payment information necessary to process your payment.
 - To simplify the payment process, if you pay by credit card, we save the last four digits of your payment card, the expiration date of your payment card, the card type, your first and last name, your billing address, and a token identifier to match your information to your full payment card number, which is stored by the applicable payment processor. We do not store your full payment card number or your CVV2 number (the 3 to 4

digit security code on your card). We do not have access to your full payment card number stored by the applicable payment processor.

- Please see the applicable payment processor's website (e.g., CardConnect and Ordway) to review their terms of service and privacy policies for information on their use and storage of your Personal Data.
- **Advertising Partners.** These parties help us market our Offerings and provide you with other offers that may be of interest to you. They include:
 - Ad networks.
 - Marketing providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Offerings. They include:
 - Companies that track how users found or were referred to the Offerings.
 - Companies that track how users interact with the Offerings.
- **Parties You Authorize, Access, or Authenticate.** These parties partner with us in offering various products or integrations. They include:
 - Businesses that you have or seek a relationship with, such as Plaid and other integrated products.
 - Companies that we partner with to offer joint promotional offers or opportunities.
- **Bank Partners.** We have bank partnerships that allow you to use our Offerings with your bank accounts. Depending on the integration, we may share Identity Data and other Personal Data with the bank to facilitate your use of your bank account with our Offerings and for security, compliance and related purposes.
- **Affiliates.** We may share data with our current and future corporate affiliates for purposes consistent with this Privacy Policy.
- **Other Users.** If you use our Offerings as a customer, we make available audit logs and usage data to other users on your company's account (such as IP address and certain associated activity) to allow our customers to observe logs or activity within their accounts.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under **Meeting Legal Requirements and Enforcing Legal Terms** in the **Our Commercial or Business Purposes for Collecting Personal Data** section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Offerings and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools and Opt-Out

The Offerings use cookies and similar technologies such as pixel tags, web beacons, clear GIFs, and JavaScript (collectively, "**Cookies**") to enable our servers to recognize your web browser, tell us how and when you visit and use our Offerings, analyze trends, learn about our user base and operate and improve our Offerings. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone, or similar device when you use that device to access our Offerings. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Offerings do not support "Do Not Track" requests sent from a browser at this time.

We use the following types of Cookies:

- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Offerings, maintain your preferences over time and recognize you when you return to our Offerings. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Marketing and Analytics Cookies.** Marketing and Analytics Cookies allow us to understand how visitors use our Offerings. They do this by collecting information about the number of visitors to the Offerings, what pages visitors view on our Offerings and how long visitors are viewing pages on the Offerings. Marketing and Analytics Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Offerings' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics Offerings. Google's ability to use and share information collected by Google Analytics about your visits to the Offerings 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 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/>.
- **Advertising Cookies.** Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled **Information about Interest-Based Advertisements**.
- **Essential Cookies.** Essential Cookies are required for providing you with features or Offerings that you have requested. For example, certain Cookies enable you to log into

secure areas of our Offerings. Disabling these Cookies may make certain features and Offerings unavailable.

In addition to updating your Cookie preferences in the [Website Data Collection Preferences](#) pane of the Modern Treasury website, you can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Offerings and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

Information about Interest-Based Advertisements

We may display advertisements on third-party platforms or websites through our use of Advertising Cookies. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors ("**Interest-Based Ads**"). Information for Interest-Based Ads (including Personal Data) may be provided to us by you or derived from the usage patterns of particular users on the Offerings and/or offerings of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Offerings. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "**web beacon**") from an ad network to you through the Offerings. Web beacons allow ad networks to provide anonymized, aggregated auditing, research, and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

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 a consumer's online behavior across different websites and properties. Modern Treasury does not currently participate in DAA or NAI programs. To make choices about Interest-Based Ads from participating third parties, including 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/> or www.aboutads.info/choices. Users in the European Union should visit the European Interactive Digital Advertising Alliance's user information website <http://www.youronlinechoices.eu/>.

Opt-Out of Marketing Communications

You may opt-out of our marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at privacy@moderntreasury.com. You may continue to service service-related and non-marketing emails.

Data Security & Retention

Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

Retention

We retain Personal Data about you for as long as necessary to provide you with our Offerings. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Offerings or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@moderntreasury.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the **Exercising Your Rights** section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain Offerings to our customers. If we are processing your Personal Data as a processor or service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@moderntreasury.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to, among other things, provide you with the Offerings, for security and integrity or debugging and repair purposes, or to complete a transaction or other action you have requested or comply with a legal obligation. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data (except to the extent "sharing" Personal Data is considered a "sale" under CCPA; see next section).

Personal Data Sharing Opt-Out and Opt-In

Under the CCPA, California residents have certain rights when a business "shares" Personal Data with third parties for purposes of cross-contextual behavioral advertising. We have shared

the following categories of Personal Data for the purposes of cross-contextual behavioral advertising:

- Web and Email Analytics
- Device/IP Data
- Identifiable lead information

As described in the **Tracking Tools, Advertising and Opt-Out** section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CCPA, sharing your data through third party Cookies for online advertising may be considered a "sale" of information. You can opt out of data selling and/or sharing by following the instructions in this section.

We share Personal Data with the following categories of third parties:

- Ad Networks.
- Marketing providers (including for cross-contextual behavioral advertising purposes)

Over the past 12 months, we have shared your Personal Data with the categories of third parties listed above for the following purposes:

- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

You have the right to opt-out of the sharing of your Personal Data. You can opt-out using the following methods:

- You can modify your cookie settings here: [Website Data Collection Preferences](#)
- You can complete the online form found here: [Do Not Share My Personal Information](#).
- You can email us at privacy@moderntreasury.com.
- You can use a [Global Privacy Control](#). Please note this does not include Do Not Track signals.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sale and/or sharing of your Personal Data for at least 12 months.

To our knowledge, we do not sell or share the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or Offerings, charge you different prices or rates, or provide you a lower quality of goods and Offerings if you exercise your rights under the CCPA.

Exercising Your Rights under CCPA

To exercise the rights described in this Privacy Policy, you or, if you are a California resident, your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (we will ask you for your first and last name, email address, state, and country), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request by completing the request form [here](#) or emailing us at the following email address: privacy@moderntreasury.com.

If you are a California resident, you may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

European Union and United Kingdom Data Subject Rights

EU and UK Residents

If you are a resident of the European Union ("**EU**"), United Kingdom ("**UK**"), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the "**GDPR**") with respect to your Personal Data, as outlined below.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure.

As explained in **What this Privacy Policy Covers** section above, this Privacy Policy applies when Modern Treasury is the controller of your Personal Data processed in connection with the Offerings. Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of certain Offerings to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at privacy@moderntreasury.com.

Personal Data We Collect

The **Categories of Personal Data We Collect** section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The **Our Commercial or Business Purposes for Collecting Personal Data** section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

- **Contractual Necessity:** We process the following categories of Personal Data as a matter of "contractual necessity", meaning that we need to process the data to perform under our agreement with you, which enables us to provide you with the Offerings. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Offerings that require such data.
 - Profile or Contact Data
 - Online Identifiers
 - Payment Data
 - Commercial Data
 - Identity Data
- **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
 - Profile or Contact Data
 - Online Identifiers
 - Device/IP Data
 - Web Analytics
 - Audio or Video
 - Geolocation Data
 - Other Identifying Information that You Voluntarily Choose to Provide
 - We may also de-identify or anonymize Personal Data to further our legitimate interests.
- Examples of these legitimate interests include (as described in more detail above):
 - Providing, customizing and improving the Offerings
 - Marketing the Offerings
 - Corresponding with you
 - Meeting legal requirements and enforcing legal terms

- Completing corporate transactions
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The **How We Share Your Personal Data** section above details how we share your Personal Data with third parties.

EU and UK Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at privacy@moderntreasury.com or use the request form [here](#). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request. We may also need to retain certain information for record keeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed from such locations.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Offerings.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Modern Treasury's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Offerings are hosted and operated in the United States ("U.S.") through Modern Treasury and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Offerings, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Modern Treasury in the U.S. and will be hosted on U.S. servers, and you acknowledge that may be transferred, stored, and processed your information to and in the U.S., and possibly other countries.

Changes to this Privacy Policy

We're constantly trying to improve our Offerings, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Modern Treasury website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Offerings, and you are still responsible for reading and understanding them. If you use the Offerings after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- Website: <https://www.moderntreasury.com/>
- Email: privacy@moderntreasury.com
- Address: Modern Treasury Corp., 315 Montgomery St., 10th Floor San Francisco, CA 94104, Attn: Privacy