

Privacy Policy - Onu

Date: November 15, 2021

At Village Financial, Inc. (“Onu,” “we,” or “us”), we have established a Privacy Policy to protect the information that we secure for business purposes. We are committed to protecting the personal information that we have obtained about you. This Privacy Policy describes how we collect, use, share, and protect your personal information. By accessing or using our website, mobile application, (collectively, the “Site”) or services, you acknowledge that you have read, understood, and agree to this policy. If you cannot agree to this policy, then please do not use our Site or services. To further understand our policy, please review the below details.

Remember that your use of our services is always subject to our [Terms of Use](#).

Our services are intended for users in the U.S.A. If you visit or use one of our services, your information may be processed in the U.S.A. and/or transferred outside of the U.S.A. to other third parties in connection with the services rendered by us.

This Privacy Policy only applies to us and not to any third-party sites or services you may access through our website, our mobile application, or by using any of our services and does not apply to information submitted or collected by websites maintained by other companies or organizations to which we may link or who may link to us. We are not responsible for the actions and privacy policies of third-party websites or services rendered by such parties.

What is Personal Information?

When we use the term “personal information” in this Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. It does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to you. Personal information includes, without limitation, information we collect when you access or use the services to view, manage, or conduct transactions through Onu. Personal information includes, without limitation, information we collect when you access or use the services to view, manage, or conduct transactions using your brokerage account from our partnering broker-dealer (“Broker-Dealer”), which is made available by the Broker-Dealer. However, this Privacy Policy does not apply to the financial products offered by the Broker-Dealer itself. Please refer to the terms and conditions you enter into with the Broker-Dealer and the Broker-Dealer’s privacy policy for information concerning those products and your privacy rights with respect to those products.

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. For example, we may aggregate personal information and (a) use it for internal management purposes, (b) use it to target offers that are made to users through our services,

(c) to calculate the percentage of users accessing a specific app feature, and (d) use it for any other purpose not prohibited by law. This type of information includes, for example, the types of gifts sent to recipients, the value of those gifts and the web, app, instore or other channels through which the purchases are made. However, if we combine or connect aggregated data with other data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

Our Collection of Personal Information

From the first moment you interact with us, we are collecting personal information about you. Sometimes we collect personal information automatically when you interact with our services and sometimes we collect the personal information directly from you. At times, we may collect personal information about you from other sources and third parties, even before our first direct interaction.

Personal Information You Provide

We collect personal information from parents in order to facilitate the creation of custodial accounts or Uniform Gifts to Minors Act (“UGMA”) accounts at the Broker-Dealer for your children and to allow you to provide instructions to the Broker-Dealer in order for you to execute certain trades, including gifting financial investments to your friends and family. We collect personal information you provide in connection with our services. This information may include but is not limited to:

- Contact information such as name, email address, home address, phone.
- Identity Data, which includes, but is not limited to, first name, last name, username or similar identifier, title, date of birth, gender, tax identification or social security number or any other government issued identification number, and any form of identification that you provide to us so that we can verify your identity.
- Biometric and Sensory Data: includes facial scan images.
- Financial Data, which includes, but is not limited to, bank account and payment card details.
- Financial information such as bank or brokerage account numbers, types of investments, or other transaction information.
- Technical Data, which includes, but is not limited to, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- Profile Data, which includes, but is not limited to, your username and password, your interests, preferences, feedback and survey responses.
- Usage Data, which includes, but is not limited to, information about how you use our website and services.
- Marketing and Communications Data, which includes, but is not limited to, your preferences in receiving marketing from us and our third parties and your communication preferences.
- Other Information, which includes, but is not limited to, information you may provide, such as information you provide when you contact us with questions, feedback, survey responses, participation in contests, promotions or other prospective seller marketing forms or devices, suggestions for improvements of our services or products, referrals, or otherwise communicate with us, and/or personal information you affirmatively disclose to us in connection with your interactions with us, including through your use of our services..

You have the ability to review and edit some contact information collected about you through our services.

In order to create an account with the Broker-Dealer for a child, we will need the parent of the child to supply the following information about the child:

- Child first and last name
- Child date of birth
- Child Social Security number
- Child address
- Child profile picture (optional)

For Onu users that are not opening custodial investment accounts through our service, but are using the app to instruct the Broker-Dealer to send gifts to children (givers), we collect (in addition to other information):

- First Name
- Last Name
- Email Address
- Phone Number
- Financial information, such as bank or brokerage account numbers, types of investments

Referral Program. If you wish to refer friends or family members to Onu, you may share your referral link individually with those friends or family members. Onu does not directly collect any

personal information from your friends or family members when you share your referral link with them. Personal information is only collected if the referral chooses to sign up with Onu. You will, however, receive certain communications from us about your referrals. For example, you will be notified if your friend or family member signs up for Onu. We may also use the referral link for the purposes of instructing Broker-Dealer to credit their/your brokerage account with Broker-Dealer with any referral offer to which you may both be eligible. By sending a referral link to any party, you are disclosing to such party that you have a relationship with us and the Broker Dealer.

Personal Information Automatically Collected

As is true of most digital platforms, we collect certain personal information automatically when you visit our online services, including, but not limited to:

- Technical Data and log file data, including your internet protocol (IP) address, operating system, browser type, browser id, date/time of visit, and pages visited.
- location data, including your general geographic location based on your IP address or more precise location when accessing our services through a mobile device.
- Usage Data.
- analytics data, including the electronic path you take to our services, through our services and when exiting our services, as well as your usage and activity on our services, such as the links and object you view, click or otherwise interact with (also known as “Clickstream Data”).
- “Web Beacons” (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our services for several purposes, including to deliver or communicate with cookies, to track and measure the performance of our services, to monitor how many visitors view our services, and to monitor the effectiveness of our advertising. Unlike cookies, which are stored on the user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).
- information sent by your mobile device or web browser. We collect certain information that your mobile device sends when you use our services. For example, we may collect a device identifier, user settings and the operating system of your device, as well as information about your use of our services.

For information about our and our third-party partners’ use of cookies and related technologies to collect information automatically, and any choices you may have in relation to its collection, please visit our Cookie notice (below).

Personal Information from Other Sources and Third Parties

We obtain personal information from third party sources, which we often combine with personal information we collect either automatically or directly from you.

We receive certain categories of personal information (as described above) from the following sources and third parties:

- public databases and ID verification partners. We obtain information about you from public databases and ID verification partners to verify your identity and information you may provide us.
- third party sources. We also obtain information about you from third party sources. Such information may include credit report information, identity verification information, fraud detection information, collection information, and information about any person or corporation with whom you have had, currently have, or may have a financial relationship.
- data append services, data brokers, and joint marketing partners. We receive personal information from these sources so that we can better understand which of our services may be of interest to you.
- external bank or brokerage account information providers. When you use certain services, we may collect from you, e.g., usernames, passwords, account numbers, and other account information for third-party websites and Internet banking and/or brokerage services. This information is used to obtain your account, transaction, and other banking information from the relevant financial institution on your behalf.
- Financial institutions. We obtain information about you from your financial institution to provide our service.

We also receive: data from analytics providers such as Google; demographic data from advertising sources such as Facebook, Snapchat, Instagram, Twitter, and Google; data from merchants who you make transactions with using our services or who otherwise permit you to enroll in any cashback or discount program offered by such merchants; data from affiliate advertising networks; data from technical monitoring and error reporting service providers; and contact and document information from identity verification providers.

Use of Personal Information

We may use your personal information:

- to provide you with our services. For parents, we use the personal information you provide to set up and maintain your brokerage account at Broker-Dealer and deposit gifts into your brokerage account at Broker-Dealer for your child. Children's information provided by parents is used to set up the brokerage account at Broker-Dealer in the child's name. For givers, we use your personal information to process and deliver your instructions related to your gift to Broker-Dealer for it to provide the gift to your intended

recipient. We use your personal information if you choose to subscribe to our newsletter or sign up for our waitlist.

- to communicate with you about your account, such as to enable security functions such as two-factor authentication or to notify you about gifts or other account activity. Such communications may be made by email or, with your consent, by sending text messages to your mobile device.
- to fulfill your requests for our products, programs, and services, to respond to your inquiries about our services, and to offer you other products, programs, or services that we believe may be of interest to you.
- to improve our services and run our services. We may use personal information to research, analyze, and understand how users access and use our services, both on an aggregated and individualized basis, in order to help us improve our services and develop new products. We also use personal information to operate, maintain, test, improve (including developing new products and services), enhance, update, monitor, diagnose, fix, and improve our services.
- to personalize your experience. When you use our services and sites, as well other third-party sites and services. In this case, we might use tracking technologies like cookies.
- for marketing purposes. We may use your personal information to communicate with you regarding certain products, services or promotions offered by us or certain third-party products and services we believe you may be interested in, provided that you have not already opted out of receiving such communications.
- to send you locally relevant options. We can only do this if you make your location available to us. If you do, this can help us enhance the security of our sites and services, and customize our services by sending your relevant coupons and otherwise personalizing content for you (e.g., through appropriate ads and search results).
- to make it easy for you to find and connect with others. For example, if you let us access your contacts, we can suggest connections with people you may know.
- to detect, investigate, and prevent fraud and security issues. We use your personal information as necessary to protect us, our customers, and our business partners, including by investigating and preventing fraudulent activities, unauthorized access to the services, and other illegal activities.
- to verify information you have provided to us or to protect against fraudulent or illegal activities, including using information to validate your address through third party databases.
- to comply with all applicable laws and regulations. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to comply with applicable anti-money laundering laws, to report

to credit bureaus, and to respond to subpoenas or requests from the respective government authorities.

- to enforce and carry out contracts and agreements between us and you.
- to register you as a new customer.
- to assess each proposed transaction that you request through or in connection with services.
- to manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy; and (b) asking you to leave a review or take a survey.
- to retain records of our financial transactions and contracts with you in order to maintain adequate accounting records and meet legal requirements.

In addition, we may use your personal information described above (i) in connection with performing the contract we are about to enter into or have entered into with you; or (ii) when it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

If you choose to contact us, we may need additional information to fulfill your request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Policy. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.

Sharing Personal Information

We may disclose your personal information in the following ways:

- **Broker-Dealer.** We may disclose personal information to Broker-Dealer or its service providers in connection with banking, securities or brokerage products or services the Broker-Dealer may provide to you. The personal information shared with Broker-Dealer will be used, processed, collected and managed by Broker-Dealer in accordance with its privacy policy.
- **Service providers.** We share your personal information with service providers that we have engaged to perform services on our behalf, including to third parties, in connection with the services we provide to you. This includes service providers that: conduct research and analytics; create content; provide customer, technical or operational support; conduct or support marketing (such as email or advertising platforms); host the services; maintain databases; send or support online or mobile advertising; allow you to conduct transactions in connection with the services; and otherwise support or help us provide the services. Service providers also include payment processors, payment networks, external bank account information providers, credit reporting and scoring

agencies, providers of identity services, risk investigation and mitigation service providers, hosting, technology and communication providers, security and fraud prevention consultants, risk investigation and mitigation service providers, support and customer service vendors and product fulfillment and delivery providers. You acknowledge that such third parties will have access to your personal information on a need basis, in connection with the services rendered by us.

- Advertising and marketing partners. We share your personal information with other third parties, including advertising/analytics partners who enable the delivery of interest-based advertising to users, as well as vendors that provide specific services we do not.
- Business Transaction or Reorganization. We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership. We may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- Legal Obligations and Rights. We may disclose personal information to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect the rights and property of us, our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or
 - as otherwise required by applicable law.
- Consent. We may disclose personal information about you to certain other third parties with your consent.
- We may share your personal information as appropriate to carry out any other legitimate business purposes permitted by law, such as sharing with our service providers and other partners that provide support to us when providing services to you.

Payment Providers

Onu uses Plaid Technologies, Inc. (“Plaid”) to facilitate ACH transactions in connection with our services. If you sign up for Onu’s services, you expressly consent to Onu sharing your contact

and billing data with Plaid for the purposes of opening and supporting your brokerage account with the Broker-Dealer. You are responsible for the accuracy and completeness of that data.

We also use Plaid to gather your data from financial institutions. This data may include information from all your sub-accounts (e.g., checking, savings, and credit card) accessible through a single set of account credentials, even if only a single sub-account is designated by you. By using our services, you grant us 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>).

Cookie Notice

Scope of Cookie Notice

This provision explains how we and our business partners and services providers use cookies and related technologies in the course of managing and providing our online services and our communications to you. It explains what these technologies are and why we use them, as well as your rights to control our use of them. In some cases, we may use cookies and related technologies described in this provision to collect personal information, or to collect information that becomes personal information if we combine it with other information.

What We Collect When Using Cookies

We and our third-party partners and providers may use cookies to automatically collect certain types of usage information when you visit or interact with our email communications, websites and other online services. For example, we may collect log data about your device and its software, such as your IP address, operating system, browser type, date/time of your visit, and other similar information. We may collect analytics data or use third-party analytics tools, such as Google Analytics, to help us measure usage and activity trends for our online services and better understand our customer base.

Third-party partners and providers may also collect personal information about your online activities over time and across different websites when you use our websites and online services.

How We Use That Information

We use or may use the data collected through cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit our websites and online services; (b) provide and monitor the effectiveness of our websites and online services; (c) monitor online usage and activities of our websites and online services; (d) diagnose errors and problems with our websites and online services; (e) otherwise plan for and enhance our online services; and/or (f) facilitate the purposes identified in the Use of Personal Information section of this Privacy Policy. We and our advertising partners also use the information we collect through cookies to understand your browsing activities, including across unaffiliated third-party sites, so

that we can deliver ads and information about products and services that may be of interest to you.

Please note that we link some of the personal information we collect through cookies with the other personal information that we collect about you and for the purposes described in this Privacy Policy.

Your Choices About Cookies

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our online services, as some features and services on our online services may not work properly. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

You can learn more about Google's practices with Google Analytics by visiting Google's privacy policy [here](#). You can also view Google's currently available opt-out options [here](#). By using the Site, you consent to the processing of data about you by Google as described here and in Google's privacy policy.

Your Choices About Online Ads

We support the self-regulatory principles for online behavioral advertising (Principles) published by the Digital Advertising Alliance (DAA). This means that we allow you to exercise choice regarding the collection of information about your online activities over time and across third-party websites for online interest-based advertising purposes. More information about these Principles can be found at www.aboutads.info. If you want to opt out of receiving online interest-based advertisements on your internet browser from advertisers and third parties that participate in the DAA program and perform advertising-related services for us and our partners, please follow the instructions at www.aboutads.info/choices, or <http://www.networkadvertising.org/choices/> to place an opt-out cookie on your device indicating that you do not want to receive interest-based advertisements. Opt-out cookies only work on the internet browser and device they are downloaded onto. If you want to opt out of interest-based advertisements across all your browsers and devices, you will need to opt out on each browser on each device you actively use. If you delete cookies on your device generally, you will need to opt out again.

If you want to opt out of receiving online interest-based advertisements on mobile apps, please follow the instructions at <http://www.aboutads.info/appchoices>.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from DAA program participants should not be based on your

interests. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA's Principles.

This Site does not respond to "Do Not Track" signals.

Links to Other Websites and Services

The Site may contain links to outside services and resources, the availability and content of which Onu does not control. We are not responsible for examining or evaluating, and we do not warrant the offering of these services and resources or the content of these websites. Onu does not assume any responsibility or liability for the actions, products, and content of these and any other websites. Any concerns regarding any such services or resources should be directed to the service or resource.

Protecting Personal Information

While we take reasonable steps to protect your personal information, nothing on the internet is 100% secure. For these reasons, we cannot guarantee that all of your personal information will never be disclosed in ways you do not expect, or which are not described in this Policy. While we protect our systems and services, we cannot guarantee the security of your information during transmission and any transmission is at your own risk. Also, you are responsible for keeping your password(s) and account information safe and private. You are also responsible for making sure your personal information is accurate and up-to-date.

Children's Personal Information

Our Site and online services may permit parents and guardians to provide instructions and receive service from Broker-Dealer related to brokerage accounts opened and maintained on behalf of minor children under the age of 13. Our websites and online services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you are under the age of 13, please do not use our websites or online services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 13 has provided personal information to us, we encourage the child's parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 13, we will promptly delete that personal information.

Transfer of Information

Our services are currently designed for use only in the United States. If you are using our services from another jurisdiction, your information may be processed in the United States or other countries that may not provide levels of data protection that are equivalent to those of your home jurisdiction.

Jurisdiction-Specific Disclosures

Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us at help@giveonu.com.

California's "Shine the Light" law (Civil Code Section §1798.83) permits California residents that have an established business relationship with us to request certain information regarding our disclosure of certain types of personal information to third parties for their direct marketing purposes during the immediately preceding calendar year. To make such a request, please send an email to nfo@giveonu.com.

Changes to Our Privacy Policy

Onu's most current Privacy Policy will be available on our website at www.giveonu.com or at the bottom of the homepage. You are encouraged to review it periodically to familiarize yourself with our Privacy Policy and how it may apply to your personal situation. If there are any material changes or amendments to the Privacy Policy, we will notify you by posting an updated Privacy Policy to the Site.

Contact Us

For additional information or questions, please contact us at: help@giveonu.com