

# Placid Inc. Privacy Policy

(Last revised June 15, 2022)

This Privacy Policy (the “Policy”) describes the information Placid Inc., a Delaware corporation (DBA Gauss), its subsidiaries, affiliates, agents and assigns (the “Gauss”, “we”, “our” or “us”) collects about you, how we use and share that information, and the privacy choices we offer. This Policy applies to information we collect when our Website at <https://www.gauss.money/> (the “Site”), as well as all related web sites, downloadable software, mobile applications (including tablet applications), and products and services provided by us and certain third parties (collectively, together with the Site, our “Services”), or when you otherwise interact with us.

We believe trust, transparency and fairness are the most important values for finance. We are committed to maintaining the confidentiality, integrity, and security of personal information about our current, past and prospective customers. These are values guide all the decisions we make, including how and what information we gather. We’ve written our policy to be as detailed and clear as possible to inform you about privacy policy while you use our Services.

**IMPORTANT:** BY ACCESSING THIS WEBSITE (THE “SITE”) AND ANY OF ITS PAGES AND ASSETS (E.G. DOCUMENTS), YOU ARE AGREEING TO OUR PRIVACY POLICY. BEFORE USING THIS SITE, YOU SHOULD READ CAREFULLY:

1. PRIVACY POLICY, WHICH NOTIFIES YOU WHAT DATA WE COLLECT, WHY DATA INCLUDING YOUR PERSONAL DATA IS COLLECTED, THE COOKIE POLICY, HOW DATA COLLECTED WILL BE USED AND TO WHOM DATA ACCESS REQUESTS ARE TO BE ADDRESSED; AND
2. THE TERMS OF USE OF WEBSITE.

THE INFORMATION, MATERIAL AND CONTENT PROVIDED IN THE PAGES OF THE SITE MAY BE CHANGED AT ANY TIME WITHOUT NOTICE, AND CONSEQUENTLY PRIVACY POLICY MAY CHANGE AT ANY TIME IN THE FUTURE. YOU AGREE TO REVIEW PRIVACY POLICY REGULARLY AND YOUR CONTINUED ACCESS TO OR USE OF THE SITE WILL MEAN THAT YOU AGREE TO ANY CHANGES.

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# Our Data Privacy Principles

1. We will only collect information that we believe to be relevant and required to understand your financial needs and to conduct our business;
2. We use your information to provide you with better customer services and products;
3. We will collect and process data based on your consent for specified and lawful purposes only, and we will not use it for further, incompatible purposes (a) without your consent, or (b) unless required by the applicable laws and regulations;
4. We will maintain appropriate standards of data quality and integrity, and we will implement policies in respect of data retention and data accuracy, including taking steps to ensure that your data on our records remain accurate and up to date, where appropriate;
5. We will not disclose your information to any external organization unless we have your consent or are required by law;
6. We may be required from time to time to disclose your information to governmental or judicial bodies or agencies or our regulators, but we will only do so under proper authority;
7. We may pass your information to other companies or agents to provide you with better customer services and products, where within your consent, permitted or required by law;
8. We maintain strict security systems designed to prevent unauthorized access to your information by anyone, including our staff;
9. We will ensure that appropriate processes are put in place so only those acting on our behalf with a business requirement to access such data are authorized to do so;
10. All our staff and all third parties with permitted access to your information are specifically required to observe our confidentiality obligations.

## Collection of Personal Data

1. We may from time to time collect the data of prospective and current customers, other connected/relevant individuals in connection with the purposes set out in this Policy. These prospective and current customers, other connected/relevant
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individuals may include without limitation the following or any of them (collectively the “data subject(s)” “you”, “your”):

- a. prospective and / or current customers applying for / using financial services, credit facilities, insurance, securities, investment, wealth management and related services, products and facilities (collectively “Services”) provided by us;
  - b. persons giving or proposing to give security or guarantees for obligations owed to us;
  - c. persons and / or organizations linked to prospective and current customer, including the shareholders, directors, controlling persons, officers and managers, partners or members of a partnership, an agent or nominee of a prospective and / or current customer, or in the case of a trust, including the trustees, settlors, protectors and beneficiaries of the trust; and
  - d. other persons who are relevant to prospective and / or current customers relationship with us.
2. The collection of your personal data may be in connection with various matters, such as:
  - a. applying for and / or continuing using our Services;
  - b. the provision or the continued provision of various Services by us; or
  - c. for us to comply with any laws, regulations, rules or guidelines or requests issued by any governmental or judicial bodies or law enforcement or agencies or our regulators or any other authorities.
3. If the data requested by us is not provided, we may be unable to approve provision and / or to provide (or continue to provide) Services to you or to the relevant current customer or / and prospective customer linked to you.
4. Data may be collected from (a) data subjects in the ordinary course of (or the continuation of) the customer's relationship with the Gauss (e.g. when data subjects apply for credit, etc.), (b) a person acting on behalf of the data subjects whose data are provided, (c) data subjects' use of the Gauss websites, mobile apps or any other means and (d) other sources (for example, information obtained from credit reference agencies). Data may also be generated or combined with other information available to the Gauss.

## Purpose of use of Personal Data

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**Gauss does not sell any Personal Information to any third party.**

We will use data for the following purposes or any of them:

1. considering and processing applications for our Services, and the daily operation of Services provided to you or the relevant customer linked to you (i.e. the data subject) including, but not limited to:
    - a. To establish that you are over the age of 18 or 19 in the States of Alabama or Nebraska;
    - b. To verify your identity and guard against potential fraud;
    - c. To pull a credit report from a credit bureau, such as Equifax, to help determine your creditworthiness;
    - d. To determine your eligibility for a Line of Credit;
    - e. To enable our financial services partners to implement automatic payments and fund transfers;
    - f. To respond to your questions;
    - g. To authenticate your access to Gauss;
  2. conducting credit checks at the time of application for Services and when we conduct any credit reviews which normally takes place one or more times each year;
  3. creating and maintaining our credit, AML and fraud risk assessment models or other equivalent models;
  4. assisting other financial institutions to conduct credit checks and collect debts;
  5. ensuring ongoing credit worthiness and good standing of data subjects;
  6. designing and providing Services for data subjects' use (including verifying data subjects' identities in connection with the use of any such Services such as to execute instructions or effect transactions);
  7. analyzing how data subjects access and use the Gauss Services, including services available on the Gauss websites, mobile apps or through any other means from time to time;
  8. marketing services, products and other subjects (including in connection with direct marketing, which is explained further below in "Direct marketing" section of this document);
  9. determining the amount of indebtedness owed to or by data subjects;
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10. the enforcement of data subjects' obligations, including without limitation the collection of amounts outstanding from data subjects and those providing security or guarantee for data subjects' obligations owed to us;
11. meeting obligations, requirements or arrangements, whether compulsory or voluntary, of Gauss, including (but without limitation to):
  - a. any law, regulation, judgment, court order, voluntary code, sanctions regime, within or outside the United States of America ("USA") existing currently and in the future (the "Laws");
  - b. any guidelines, guidance or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside USA existing currently and in the future and any international guidance, internal policies or procedures;
  - c. any present or future contractual or other commitment with any local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of Gauss (together, the "Authorities" and each an "Authority") that is assumed by, imposed on or applicable to the Gauss; or
  - d. any agreement or treaty between the Authorities;
12. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Gauss and / or any other use of data and information in accordance with any programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
13. conducting any action to meet the obligations of Gauss, to comply with Laws or international guidance or regulatory requests relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters;
14. meeting any obligations of Gauss to comply with any demand or request from the Authorities;
15. enabling an actual or proposed assignee of Gauss, or participant or sub-participant of the Gauss rights in respect of the data subject to evaluate the

- transaction intended to be the subject of the assignment, participation or sub-participation;
16. exchanging information with merchants, business partners and co-branding partners of Gauss (such merchants, business partners, co-branding partners, collectively, the “Partners”);
  17. performing any functions and activities related to Services provided by the Gauss including, marketing, display content based upon your interests, offer products and services of third parties that we think you might find of interest, auditing, reporting, market research, and general servicing and maintenance of its products and/or services;
  18. any other purposes relating to the purposes listed above; and
  19. any other purpose in accordance with Gauss general policies or those in relation to its Services as set out in any statements, circulars, notices or other terms and conditions made available by the Gauss from time to time.

## Direct Marketing

Where a data subject has given consent for Gauss to do so, Gauss may use the data subject's personal data to provide the data subject with direct marketing. Accordingly, please note that:

1. Gauss may use the following categories of data for its direct marketing purposes:
    - a. the name, contact details, Services portfolio information, transaction pattern and behavior, transaction location, financial background and demographic data of a data subject held by the Gauss from time to time; and
    - b. information relating to the data subject's use of Gauss websites, mobile app from time to time, whether through cookies or otherwise;
  2. the following classes of Services may be marketed:
    - a. financial, insurance, fiduciary, investment services, credit card, securities, investment and related services;
    - b. reward, loyalty or privileges programs and related services;
    - c. benefits, promotional offers, services\* offered by the Gauss and/or the Partners (the names of such partners can be found in the application form(s) for the relevant services and products, as the case may be);
    - d. merchant services, including incentives and offers; and
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- e. donations and contributions for charitable and/or non-profit making purposes;

\* “benefits”, “promotional offers”, “services” and “products” refers to products, reward, loyalty or privilege programs and other benefits that may be offered by the Gauss and Partners for the purpose of marketing the aforementioned entities’ businesses. It is not possible to be specific about (1) who these Partners are from time to time and (2) what these products, services, reward, referral, loyalty or privilege programs and other benefits may be because Partners are involved in a variety of commercial enterprises. An Example of a typical benefit or promotional offer includes welcome gifts for new customers.

- 3. the above services, products and subjects may be provided or (in the case of donations and contributions) solicited by the Gauss and/or:
  - a. third party financial institutions, insurers, credit card companies, securities and investment services providers;
  - b. Partners;
  - c. third party reward, loyalty, co-branding or privileges program providers; and
  - d. charitable or non-profit making organizations;

If a data subject does not wish the Gauss to use or provide his personal data to third parties for use in direct marketing as described above, the data subject may exercise his opt-out right by notifying the Gauss via the communication channels specified in the end of this document.

## Personal data we collect

- 1. Personal information provided by you to us when you apply for our Services, which include but is not limited to your name, date of birth, residential and correspondence address, phone number, email address, salaries, income and assets, credit-related information, social security number and documents or other media that verifies your identity such as your driver’s license, passport and biometric data (facial image / selfies / video calls) you make at our request;
  - 2. Communications data includes how you want us to contact you and your preferences for the marketing we send you;
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3. Financial data includes information about your financial products and accounts with other organizations (e.g. banks, non-banking lenders), account numbers, banking card numbers, transactions conducted through your accounts, credit history, employment information, tax returns, credit scores and other information provided by consumer reporting agencies, and any data on Gauss Services you use;
4. Technical data means details such as navigational and other information transferred when visiting our websites or using our mobile applications, up to and including: operating system, IP address, mobile device IDs, your mobile network, device type, cookies, browsing activity, geo location, browser type, the settings and applications on your mobile phone;
5. Usage data includes information about how you use our website, the Gauss app and Services, referring / exit pages and URLs, number of clicks and how you interact with links on the Site, domain names, landing pages, pages viewed, your use of third party applications;
6. General due diligence includes data that the law requires us to process about you in relation to illegal activities involving money laundering;
7. Financial due diligence includes data we receive from credit reference agencies to help with responsible lending decisions.

In addition, we may compile aggregate, anonymous, or de-identified data from various sources, including but not limited to accounts and transactions. This data, which we may use for our business purposes consistent with applicable law, does not identify individual customers.

## Children

We do not knowingly collect or solicit any information from anyone under the age of eighteen (18) or individuals under the age of nineteen (19) in the States of Alabama or Nebraska at this Site. The Site and its content are not directed at children under the age of eighteen 18 or individuals under the age of nineteen (19) in the States of Alabama or Nebraska. If we learn that we have collected personal information from a child under age eighteen 18 or individuals under the age of nineteen (19) in the States of Alabama or Nebraska, we will delete that information promptly. If you believe that we might have any information from a child under eighteen 18 or individuals under the age of nineteen (19) in the States of Alabama or Nebraska, please contact us at [support@gauss.money](mailto:support@gauss.money).

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## 3rd party data providers

In order to provide you with the best service possible, the Company uses an Application Programming Interface supplied by multiple vendors including but not limited to Plaid Technologies, Inc. ("Plaid"), used to gather your data from financial institutions. By using our Services, you acknowledge and agree to Plaid's privacy policy, available at <https://plaid.com/legal> and acknowledge and agree that your information shall be treated in accordance with such policy. Gauss signed strict confidentiality agreements with all 3rd party data providers.

## Collection and Use of Information Collected Automatically

We receive and store certain types of information automatically, such as when you visit our site, read our emails, or download and use our Services. This information does not necessarily reveal your identity directly but may include information about the specific device you are using, such as the hardware model, operating system version, or web-browser software. For example, we may use data collection and tracking tools such as cookies, clear gifs (also known as web beacons), pixel tags, and other similar tracking techniques that may be embedded into HTML-based emails sent to you, be downloaded to your personal computer, tablet, mobile phone or other device ("Device") when you visit or interact with our website.

### Use of cookies

Cookies are small data files which are placed on your device when you visit certain parts of our website or click on our online advertisements. Cookies and similar technologies are used to identify your device for the following purposes:

1. Strictly necessary cookies. These essential cookies are set throughout our website and are required for the operation of our website to:
    - a. allow our web server to determine whether the cookies setting on your web browser has been enabled or disabled. This allows us to know whether data can be collected from your web browser;
    - b. temporarily allow you to carry information between pages of our website to avoid having to re-enter that information; or
    - c. temporarily identify your device after you have logged in to a secure page on our website so that our web server can maintain a dialogue with your web browser in order for you to carry out certain activities.
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2. Analytical/performance cookies. These are used to help us improve our website by tracking your visits to our website and recognizing your web browser when you are a repeat visitor so that we can gather statistics on new and repeat visitors to evaluate site effectiveness.
3. Functionality cookies. These are used to recognize you when you return to our website. This enables us to:
  - a. personalize our content for you and remember your preferences (for example, your choice of language and region); or
  - b. store your login and other preferences so you do not have to re-enter that information when you return to the website.
4. Targeting / advertising cookies. These cookies record your visit to our website, your response to our online advertisements, track the pages you have visited, and the website links you have followed. We use this information to:
  - a. make our website more relevant to your interests;
  - b. provide online advertisements or offers on our website or third-party websites which are most likely to interest you; or
  - c. evaluate the effectiveness of our online marketing and advertising programs.

The above cookies may be placed on your device by us or by third parties on our behalf (for example, advertising networks and providers of external services like web traffic analysis services). No personally identifiable information about you is collected or shared with third parties as a result of this research.

Most web browsers are initially set up to accept cookies. You can choose to 'not accept' cookies by changing the settings on your web browser but if you block all cookies, including strictly necessary cookies, you may find that certain features on our website will not work properly. If you accept cookies, you will be acknowledging that your information is being collected, stored, accessed and used as outlined above.

## Automated analytics and decisioning

We may use certain algorithms when considering and processing your application for the establishment of Services. The algorithms may provide automatic assessments and decisions based on the personal data collected in accordance with our Privacy Policy. The parameters used in these assessments aim to provide a fair and objective assessment of your personal data and we committed to put reasonable effort to ensure their reliability and fairness. If we are uncertain about the accuracy of the personal data

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that will be used in an algorithmic assessment, we may ask you to clarify any such personal data. You may also enquire or request reviews on the decisions made by our automated applications via the channels which we may designate from time to time.

## Personal data of another person

Where you have provided us with another person's personal data, you should provide him/her with a copy of this Privacy Policy and inform them of how we may use his/her data.

## Security

Once we receive your data, we'll do our best to protect it because the security of your personal data is important to us. Inspired by industry standards like NIST 800-53 we have technical and organizational security measures in place to safeguard your personal data (including personal data in transit and storage). We have enabled HTTPS access to our site, in addition to SSL technology. These security measures ensure that the confidentiality and integrity of your personal data is not compromised. Multiple layers of protection have been put in place to protect against leakage of personal data to external parties. Personal data will be encrypted by strong data encryption algorithms using encryption keys unique to us and with proper key management. When using external service providers, we require that they adhere to certain security standards mandated by us through contractual provisions, including any such provisions approved by a privacy regulator, and oversight of the service provider. Regardless of where personal data is transferred, we take all steps reasonably necessary to ensure that personal data is kept securely.

Additional steps we are taking to safeguard your personal information through vigorous physical, electronic, and operational policies and practices are:

- **Session Time-Outs:** We employ session time-outs to protect your account. You will be logged out of the Services after ten (10) minutes of inactivity. This reduces the risk of others being able to access your account if you leave your computer and / or Device unattended.
  - **Protection of Account Numbers:** After you have entered your account numbers, we will never display your full account number.
  - **Secure, Off-Site Hosting:** We store your personal and sensitive financial data such as Social Security numbers and bank accounts in an encrypted and ringfenced virtual private cloud hosted by Amazon Web Services.
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- **Defined Service Access points:** Data can only be read or written through defined service access points, the use of which is password-protected and limited to only those employees or third parties who have a need to know.
- **Secure Socket Layer certificate technology:** We equip our servers with SSL certificate technology to provide a safe and secure channel to interact with our Services.
- **Data encryption:** SSL also ensures that all data entered is encrypted. For further encryption protection, we require a 256-bit secure browser.
- **Network firewalls:** There is no inbound communication allowed between data and application servers and the Internet.

You should also be aware that the Internet (including applications which use the Internet for data transfer) may not be a secure form of communication and sending us personal data over the Internet may carry with it risks including the risk of access and interference by unauthorized third parties. Information passing over the Internet may be transmitted internationally (even when the sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than your country of residence.

## Disclosure of Personal Data

Data held by the Gauss relating to a data subject will be kept confidential but the Gauss may provide such information to the following parties (whether within or outside United States of America) for the purposes set out in the section “Purpose of use of Personal Data” above:

1. our affiliated and subsidiary companies, any agents, contractors, sub-contractors, service providers or associates of Gauss (including their employees, directors, officers, agents, contractors, service providers, and professional advisers);
2. any third-party service provider who provides administrative, mailing, telecommunications, information technology, computer, payment, debt collection or other services to the Gauss in connection with the operation of its business (including their employees, directors and officers);
3. any Authorities;
4. any person under a duty of confidentiality to the Gauss;
5. any persons acting on behalf of an individual whose data are provided, payment recipients, beneficiaries, account nominees, intermediary,

- correspondent and agent banks, or a person making any payment into the customer's account;
6. credit reference agencies, and, in the event of default, to debt collection agencies;
  7. any person to whom Gauss is under an obligation or required or expected to make disclosure for the purposes set out in, or in connection with the section "Purpose of use of Personal Data" point 11, 12 or 13;
  8. any party giving or proposing to give a guarantee or third-party security to guarantee or secure your obligations;
  9. any interface (such as an application programming interface) that links to, or in any way makes available information about, our Services;
  10. any actual or proposed assignee of the Gauss or participant or sub-participant or transferee of the Gauss rights in respect of the data subject; and
  11. any other authorized organization;
    - a. third party financial institutions, insurers, credit card companies, securities and investment services providers;
    - b. third party reward, loyalty, co-branding or privileges program providers;
    - c. Partners;
    - d. charitable or non-profit making organizations; and
    - e. external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centers, data processing companies and information technology companies) that Gauss engages.

## Information You Share Socially

Our Services may allow you to connect and share your actions, comments, content, and information publicly or with friends. We are not responsible for maintaining the confidentiality of any information you share publicly or with friends.

Our Services may also allow you to connect with us on, share on, and use third-party websites, applications, and services. Please be mindful of your personal privacy needs and the privacy needs of others, as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of third

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parties. Please contact those sites and services directly if you want to learn about their privacy practices.

## Retention of personal data

Personal data provided by you are retained in line with applicable legal and regulatory obligations and for business and operational purposes. In the majority of cases, this will be for 7 years from the end of your relationship with us. You can ask us to permanently delete some or all of your data earlier than this, but we can only do so if:

- a. we have no legal or regulatory obligation to retain it; or
- b. we don't need it to provide a service that you would still like us to provide to you.

If we can't permanently delete your data promptly after you ask us, please be sure that we'll let you know.

## Accessing your personal data

You have the right to access and update your information and contact us. For example, you may:

1. check whether we hold data about you and/or access to such data;
2. require us to correct any data relating to you which is inaccurate;
3. ascertain our policies and procedures in relation to data and to be informed of the kind of personal data held by us and/or you have access to; and
4. be informed on request which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access or correction request to the relevant credit reference agency or debt collection agency.

## Other

1. Nothing in this Privacy Policy shall limit the rights of data subjects.
  2. To the extent permitted by law, the Gauss may record and monitor electronic communications with you to ensure compliance with legal and regulatory obligations and internal policies for the purposes outlined in this Privacy Policy.
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3. This Privacy Policy shall be deemed an integral part of all contracts, agreements, application for credit, account opening documents and other binding arrangements which you have entered into or intended to enter into with us.

## For California Consumers

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) allows California residents, upon a verifiable consumer request and subject to applicable exemptions, to request that we give you access, and (if technically feasible) in readily usable form, to the specific pieces and categories of Personal Information that we have collected or shared about you. California residents also have the right to submit a request for deletion of Personal Information under certain circumstances that Gauss is not otherwise entitled to maintain. This CCPA disclosure explains how Gauss collects, uses and discloses certain types of Personal Information or information relating to California residents. If you are a California user of the Service (“California Consumer”), you have certain rights with respect to the collection, use, transfer, and processing of your Personal Information, as described in the CCPA. We reserve the right to limit these rights where permitted under applicable law, including instances where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. Under the CCPA, personal information is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. Please note that the Gramm-Leach-Bliley Act, Bank Secrecy Act, and the CCPA and other applicable laws allows us to keep certain forms of data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. In addition, there may be certain data that we may not allow you to review for legal, security, or other reasons.

Consistent with California law, Gauss will not discriminate against those who exercise their rights. Specifically, if you exercise your rights, where possible we will not deny you services, charge you different prices for services or provide you with a different level or quality of services based on this exercise of your rights.

In the last 12 months, we collected the following categories of personal information: identifiers (such as name and contact information), demographic information (such as age and gender), commercial information (such as products purchased), internet or other electronic network activity information (such as browsing behavior), geolocation data, audio, electronic, visual or similar information (such as customer support calls), and inferences we make (such as preferred activities). For more details about the personal information we collect, including the categories of sources, please see the “Personal data

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we collect” section above. We collect this information for the business and commercial purposes described in the “Purpose of use of Personal Data” section above. We share this information with the categories of third parties described in the “Disclosure of Personal Data” section above.

Subject to certain exemptions, the CCPA provides California consumers the right to request to know more details about the categories and specific pieces of personal information we collect, to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. If your information falls into one of the legal exemptions included in the CCPA, we may be unable to fulfill your request.

We do not “sell” the personal information we collect (and will not sell it in the future without providing a right to opt out). We do allow third parties to collect personal information through our services and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our services and elsewhere based on users’ online activities over time and across different sites, services, and devices.

Contact us at [support@gauss.money](mailto:support@gauss.money) to make a request to know, delete or opt-out under the CCPA.

- **Right to Know:** You have the right to request that we disclose what personal information we collect, use, disclose and sell. This includes:
    - The categories of personal information we’ve collected about you;
    - The categories of sources from which the personal information is collected;
    - The business or commercial purpose for collecting your personal information; and
    - The categories of third parties we have shared personal information with.
  - **Right to Delete:** You have the right to request that we delete personal information we have collected from you (and direct our service providers to do the same). To process your request, our team may require identity verification. In some instances we may decline to honor your request where an exception under law applies.
  - **Right to Opt-Out:** Gauss does not sell personal information.
  - **Other Rights:** You have the right to designate an authorized agent to make a request for you under the CCPA on your behalf. We may request proof of authorization and identity documentation from the authorized agent. Your authorized agent may submit a request at [support@gauss.money](mailto:support@gauss.money). You also have the right not to be discriminated against for exercising any of the rights listed above.
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For your protection, we will need to verify your identity using the information associated with your account, including email address, date of birth, and taxpayer identification number via this form before fulfilling your request. Government identification may be required. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law, which may take up to 45 days following verification of your identity.

If you have any question about our Privacy Policy, or would like to request for access to data or correction of data, or for information regarding our policies and practices and kinds of data held, please write to us at [support@gauss.money](mailto:support@gauss.money).

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# Gauss Gramm-Leach Bliley Privacy Notice

## FACTS

### WHAT DOES PLACID INC. DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"><li>■ Social Security Number and other identity information</li><li>■ account balances and payment history</li><li>■ credit history and credit scores</li><li>■ bank account, financial and income information</li></ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Placid Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Placid Inc share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	<b>Yes</b>	<b>No</b>
<b>For our marketing purposes</b> — to offer our products and services to you	<b>Yes</b>	<b>No</b>
<b>For joint marketing with other financial</b>	<b>No, unless you consent to</b>	<b>Yes</b>

companies	sharing	
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	<b>No, unless you consent to sharing</b>	<b>Yes</b>
<b>For our affiliates' everyday business purposes</b> — information about your creditworthiness	<b>No, unless you consent to sharing</b>	<b>Yes</b>
<b>For our affiliates to market to you</b>	<b>No, unless you consent to sharing</b>	<b>Yes</b>
<b>For non affiliates to market to you</b>	<b>No, unless you consent to sharing</b>	<b>Yes</b>

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call (877) 909-1559 (toll-free)</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
	<p><b>Questions?</b> Call (877) 909-1559 (toll-free) or go to <a href="https://www.gauss.money/">https://www.gauss.money/</a></p>

Who we are	
<b>Who is providing this notice?</b>	Placid Inc.
What we do	
<b>How does Placid Inc. protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

<p><b>How does Placid Inc. collect my personal information?</b></p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or give us your income information</li> <li>■ pay your bills or apply for a loan</li> <li>■ give us your contact information</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, or other companies.</p>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law give you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes - information about your creditworthiness</li> <li>■ affiliates from using your information to market you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<p><b>What happens when I limit sharing for an account I hold jointly with someone else?</b></p>	<p>Your choices will apply to everyone on your account.</p>
<p><b>Definitions</b></p>	
<p><b>Affiliates</b></p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ Placid, Inc. has no affiliates as of the date this notice is provided.</li> </ul>
<p><b>Nonaffiliates</b></p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ Nonaffiliates we share with can include direct marketing companies.</li> </ul>

<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ Our joint marketing partners can include financial institutions and marketers.</li> </ul>
<b>Other important information</b>	
<p><b>For Vermont customers:</b> We will not share information we collect about you with non affiliated third parties, except as permitted by Vermont law, such as to process your transactions or to maintain your account. In addition, we will not share information about your creditworthiness with our affiliates except with your authorization.</p> <p><b>For California customers:</b> We will not share information we collect about you with non affiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.</p> <p><b>For Nevada residents:</b> We are providing this notice to you pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call List by writing to us at Placid Inc., 200 Vesey Street, 24th Floor, New York, NY 10281. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protections, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101, phone number (702) 486-3132, email <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.</p> <p>State laws may also provide you with specific privacy protections. We will comply with applicable state laws with respect to our use of your information.</p>	