

Privacy Policy

Last updated: 7/11/2025

This Privacy Policy describes how Crecer (“Crecer,” “we,” “our,” or “us”) collect, use, and disclose personal information that we collect through our website, online communications, and any other sites or services that link to this Privacy Policy (collectively, the “Services”), in accordance with our [Consumer Privacy Notice](#).

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use our Services.

Personal Information Collection, Use, and Disclosure

Information Collected. We and our service providers collect personal information from you, your financial institution(s), and/or your employer. The personal information categories may include:

- **Identifiers and contact information**, such as your first and last name, email address, phone number, and mailing address;
- **Biographical information**, such as your date of birth, Social Security number or other government-issued identification number, marital status, and citizenship or U.S. residency status;
- **Employment or financial-related information**, such as employment status, income, net worth, payroll contribution elections, information relating to your linked bank account(s), information about your financial risk tolerance and investment objectives, and information required for our regulatory disclosures, such as your status as a control person for a publicly traded company. If you choose to link a bank account to your Crecer account, we use a third-party service provider, Plaid Inc. (“Plaid”), to connect with your financial institution. When you link your account, Plaid collects information such as account balances, transaction history, and account identifiers from your financial institution and shares it with us. By linking your account, you authorize Plaid to access and transmit your financial information to us. Your information will be transferred, stored, and processed by Plaid in accordance with [Plaid’s Privacy Policy](#).
- **Information about your beneficiaries and trusted contacts**;
- **Your preferences**, such as your preferred language and other feedback/preferences that you might express during your use of our Services;

- **Information about your interactions with our website**, such as keystrokes, mouse clicks, page flips, and what you viewed, to provide faster and better user support and aid our engineering team in solving bugs and improving user experience;
- **Information about your device**, such as your device's operating system type and version, manufacturer and model, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), advertising ID, and general location information;
- **Communications with us** via chat or phone call, to provide customer service;
- **Marketing data**, such as your choices regarding our newsletters, surveys, and other marketing displayed or provided to you, and your preferred methods of receiving such promotional communication; and
- **Login credentials** for your Crecer account.

Other Sources from which We Collect Personal Information. We may collect information from sources such as publicly available databases, marketing partners, third-party providers, and data brokers.

Information About Non-Users. In the course of using the Services, you may provide us with personal information about your beneficiaries and/or your trusted contacts. As a result, we may maintain information such as names and contact information about individuals who are not users of the Services ("non-users"). We will handle non-user information solely in accordance with this Privacy Policy. Non-users can exercise their privacy rights and choices as described in the "Privacy Rights Requests" section below.

Cookies and Other Tracking Technologies. Our website may utilize cookies and other tracking technologies in order for us to provide our Services and to enable, optimize, and analyze operation of our Services. A cookie is a small text file that may be used, for example, to collect information about website and Service activity. Certain cookies and other technologies may serve to recall information, such as an IP address, previously indicated by a user.

- **Browser Control.** Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.
- **Website Control.** You may also set your cookie preferences on our website. If you are not logged in or your IP address is blocked, you may have to re-set your

preferences on a subsequent visit when you are logged in or your address is unblocked. You may also have to do so on each device from which you access our Services.

Use of Personal Information. We may use personal information in the following ways:

- **Administering the Services.** To provide the Services to you, including arranging access to your account, verifying your information, processing your transactions, responding to your inquiries, fulfilling your requests, and sending you administrative information such as agreements to provide the Services and changes to our terms, conditions, and policies.
- **Operations and General Business.** To conduct our operations (such as troubleshooting, diagnostic testing, performance analyses of our systems and Services, testing of new system features to evaluate their impact, system and log maintenance, technical support, system debugging, and hosting data) and to facilitate mergers, acquisitions, and other reorganizations and restructurings of our business (including prospective transactions).
- **Marketing.** To send you our newsletters, publications, updates, and invitations that we think may be of interest to you, where permitted by applicable law.
- **Personalizing our Services.** To personalize our interactions with you and to provide you with information and/or offers tailored to your interests, such as delivering content via our Services that we believe will be relevant and interesting to you, where permitted by applicable law.
- **Improving and Developing Our Services.** To conduct data analysis, to monitor and analyze use of the Services, to use data analytics to improve the efficiency of our Services, to enhance, improve, repair, maintain, or modify our Services, to identify usage trends, to understand which parts of our Services are most interesting to users, to determine the effectiveness of our promotional campaigns, and for other similar purposes.
- **Aggregation and/or Anonymization.** We may anonymize and aggregate personal information that does not identify you or another individual and use and share such data for our own business purposes.
- **Security and Fraud Prevention.** To conduct audits, to verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements, to monitor for and prevent fraud, and for security purposes, including maintaining system security.

- **Legal and Compliance.** To fulfill our legal and compliance-related obligations, including complying with applicable laws, complying with legal processes, responding to requests from public and government authorities, meeting national security or law enforcement requirements, complying with requirements set by industry-specific supervisory bodies, enforcing our terms and conditions and standards, protecting our operations, protecting the rights, privacy, or property of our business, responding to auditors, pursuing available legal remedies, making insurance claims, defending claims, and limiting the damages that we may sustain.

Disclosure of Personal Information. We may disclose personal information to the following types of entities in providing the Services:

- **Service Providers.** We use service providers that provide hosting, information technology, customer support, payment processing, email and communications delivery, and analytics services for the purposes listed above. We also use Plaid Inc. to provide account aggregation and bank connectivity services. When you use these features, Plaid may collect and transmit information from your financial institution as necessary to provide the service, and your use of such features is subject to Plaid's privacy practices.
- **Professional Advisors.** We use accountants, actuaries, auditors, experts, consultants, lawyers, banks, and financial institutions to support our business.
- **Joint Marketing Partners.** We may disclose information to other financial institutions with which we have joint marketing agreements.
- **Authorities and Others.** If we are required by law or legal process or if we deem the disclosure appropriate for other legal, compliance or fraud-prevention purposes, we may disclose personal information to law enforcement, public, regulatory, and government authorities, courts, or other entities that obtain valid subpoenas.
- **Business Transferees.** We may disclose or transfer your personal information to third parties such as acquiring entities and their advisors in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Web Experience

Opting In and Opting Out. You may choose to receive promotional and advertising emails or text messages from us by providing us with your written consent directly or

through your employer. You may choose not to receive future promotional or advertising emails or text messages from us by selecting an unsubscribe link at the bottom of such emails or by texting STOP to opt-out of such text messages. You also control your notifications in your account settings. If you opt out of receiving the foregoing emails or text messages, we may still send you a response to any Contact Us request as well as administrative emails necessary to facilitate your use of our Services (for example, in connection with a password reset request, an email/text message verification, or a payment-related email/text message).

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit www.allaboutdnt.com.

Payment Processors. To facilitate financial transactions on our services, we use Plaid. When you engage in a financial transaction, you direct us to share certain information with this payment processor, and you will provide other information—such as your credit card or bank account information—directly to them. We do not record or maintain this financial information. For more information on how transactions are handled, or to understand the data security and privacy practices of the payment processor, please refer to Plaid’s privacy notice.

Links to and Interaction with Third-Party Products or Services. Our Services may enable you to interact with or contain links to your third-party accounts and other third-party websites, mobile software applications and services that are not owned or controlled by us. We are not responsible for the privacy practices or the content of these third parties. Please be aware that the third parties may collect personal information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each third party with which you choose to engage or interact.

Access, Security, Retention and Deletion

Access/Accuracy. To the extent that you do provide us with personal information, we wish to maintain accurate personal information. You may use the tools that we make available through our Services to remove or modify certain information in your account.

Security. The security of personal information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the personal information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security or confidentiality.

Record Retention/Deletion. We retain personal information as long as reasonably necessary to achieve the purposes disclosed in this Policy. The criteria determining retention periods are based on legal obligations and information sensitivity, security, product research and development, technical functionality, and experience improvement considerations. We may also retain information not formatted for targeted disposal. We specifically retain personal information:

- to respond to or comply with court orders, subpoenas, or regulator inquiries;
- as required by applicable state and federal law or regulation; and
- in response to or in anticipation of litigation.

Privacy Rights Requests

We offer you choices that affect how we handle the personal information that we control. Depending on your location and the nature of your interactions with our Services, you may request the following in relation to your personal information:

- **Information** about how we have collected, used, and disclosed personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- **Access** to a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- **Correction** of personal information that is inaccurate or out of date.
- **Deletion** of personal information that we no longer need to provide the Services or for other lawful purposes.

To make a request, please contact us in accordance with the “Contacting Us” section below. We will respond to your request consistent with applicable law. You have the right to be free from unlawful discrimination for exercising your rights under applicable law.

For your protection, we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

To the extent available under applicable law, if we refuse to take action on your request, you may appeal this refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us as described in the “Contacting Us” section below.

If you would like another person (an “agent”) to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted above. As part of our verification process, we may request that the agent provide proof of their authorization by you to submit the request.

Please note that, in some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. The rights described above are not available in connection with personal information we have collected, used, or disclosed about consumers who apply for financial products or services for personal, family, or household purposes. Such information is subject to the federal Gramm-Leach-Bliley Act or state financial privacy laws. For more information about your choices regarding this information, please see our [Consumer Privacy Notice](#).

Miscellaneous

Children’s Privacy. Our Services are not structured to attract children under the age of 13 years. Accordingly, we do not intend to collect personal information from anyone we know to be under 13 years. If we learn that we have collected personal information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us.

Changes to this Privacy Policy. We reserve the right, at our discretion, to change this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Services. If required by law, we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Services. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). Your continued use of the Services thereafter means that you accept those changes.

Contacting Us. If you have any questions or concerns about our Privacy Policy, please contact us at legal@crecer.app or call us at 888-887-8405.