Privacy Policy

1. Overview

Taabl collects, uses, and shares personal information to provide services and products to its customers and in connection with its business operations. This notice is designed to help you understand what information we collect and how we use it.

Personal information is information that identifies you, such as your name, phone number, driver's license number, or billing information, or any information that can be reasonably linked to you.

Taabl provides products and services to individuals who wish to participate in an Employee Stock Purchase Plan ("ESPP"). An ESPP is a program that allows employees to purchase shares of their employers' stock on certain prices and terms. Taabl provides individuals information about their employers' ESPPs and, in certain circumstances, lends money to the individual to purchase stock through the ESPP.

As described in more detail below, Taabl collects and uses your personal information in several ways:

- We collect and use your personal information to create an online account with us, to provide you with information about your employer's ESPP, and to lend you money to participate in your employer's ESPP. We collect this personal information from you, such as when you open an online account with us or apply for a loan, from your employer in connection with their ESPP, or from third parties, such as credit ratings agencies.
- We also collect and use your personal information in connection with your use of Taabl's website and online applications, including information about how you use our website and services. We collect this personal information from you and through third party service providers that offer web analytics services.

We may also, from time to time, update our existing services and products or offer new products and services, in which case we may collect additional personal information about you. We will update this privacy policy to reflect any changes and notify you in advance of the changes.

2. What Personal Information Do We Collect?

- a. <u>Categories of Personal Information</u>. We have collected the following types of personal information within the past 12 months:
 - <u>Identifiers</u> such as name, postal address, email address, telephone number, account name, social security number, passport number, date of birth.

- <u>Financial Information</u> such as bank account numbers and other financial information, including broker and stock elections related to your financial accounts.
- <u>Protected Information</u> such as age, national origin, citizenship, marital status, and gender.
- <u>Professional or Employment History</u> such as your employment history and compensation information.
- <u>Commercial Information</u> such as records of personal property, products or services purchased.
- <u>Internet or Network Activity</u> such as your IP address and information related to your device or browser when using our website and services.
- Inferences Drawn from Personal Information including profile information based on personal preferences, characteristics, attitudes, abilities, and aptitudes
- b. <u>Sources of Personal Information</u>. We collect the above categories of personal information from the following sources:
 - <u>You</u>. When you or your representatives provide it to us in connection with opening an account and applying for and using our products and services, or through your communications with us.
 - <u>Your Employer</u>. Your employer may provide us information in connection with the ESPP regarding your employment information, compensation data, as well as your broker and stock elections related to your financial accounts.
 - <u>Through Your Use of Our Website and Services</u>. We collect or obtain personal information when you visit our website or use any features or resources available on our website. When you visit our website, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to our Website and other technical communications information).
 - <u>Third Parties</u>. We collect your personal information from third parties, such as credit reporting agencies, brokerage accounts, and in some instances may use a third party integration software to get any relevant data in accordance with the services we provide.

3. How We Use and Share Your Personal Information

- a. <u>Reasons We Collect and Use Your Personal Information</u>. We collect and use your personal information for the following business and commercial purposes:
 - To Process Orders, Issue Loans, Perform Contracts, and Manage Accounts.
 - <u>To Respond to Your Inquiries and Provide You with Updates or Changes to</u> <u>Our Products, Services, and Policies, or to Otherwise Communicate with You</u>.
 - <u>To Improve Our Products and Services</u>.
 - <u>To Prevent, Detect, and Investigate Fraud and Other Violations of Law or of</u> <u>Our Policies</u>.
 - <u>Network Security</u>. We use your personal information to ensure that only authorized persons have access to your account and personal information and that our network and systems are secure.
 - <u>To Comply with Legal Obligations or to Pursue or Defend Against Legal</u> <u>Claims and Disputes</u>. We may use your personal information to comply with legal obligations, protect and defend the rights and property interests of Taabl, protect against legal liability, prevent or investigate possible wrongdoing, and protect the safety of our Employees, Commercial Customers, and the public.
 - <u>Marketing</u>. We may use your personal information to market our products and services to you, consistent with applicable laws.
 - <u>Operation of Our Website</u>. We use your personal information operate and manage of our website; to provide content to you; and to communicate and interact with you.
 - <u>IT Operations</u>. We use your personal information for the management of our communications and computer systems and network.
 - <u>As Otherwise Described to You at the Point of Collection or Pursuant to Your</u> <u>Consent</u>.
 - <u>To Fulfill any other Purpose Permitted under Law.</u>
- b. <u>Disclosure of Information</u>. We share your personal information with the following entities and for the following reasons:
 - <u>Third-Party Service Providers</u>. We may share your personal information with third-party service providers that perform services on our behalf, such as

providing information technology services, performing analyses, assisting us in providing products and services to you, and conducting due diligence on our behalf.

- <u>As Required by Law and Legal Proceedings</u>. We may have a legal obligation to disclose personal information to government and law enforcement entities or other third parties pursuant to valid regulatory requests, subpoenas, or court orders. We may also need to disclose your personal information to pursue and defend our legitimate interests and rights, for example, in civil and criminal litigation, to investigate potential misconduct, or to protect the safety of you, our employees, or the public.
- <u>With Your Consent</u>. We will share your personal information with other third parties as you may direct, or if you otherwise consent.
- c. <u>No Sales of Personal Information</u>. We do not sell your personal information to third parties.

4. Confidentiality and Security

We strive to use commercially acceptable and reasonable measures to protect your personal information from unauthorized access, removal, theft, disclosure, or destruction. However, please remember that no method of transmission of information over the internet, or method of electronic storage, is 100% secure and therefore we cannot guarantee perfect data security.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password to access our services through our website, you are responsible for keeping the password confidential.

We also take reasonable steps to keep the personal information we possess accurate and to securely delete incorrect or unnecessary personal information.

5. How Long Do We Retain Your Personal Information?

We will retain your personal information only for as long as is necessary for the purposes set forth in this privacy policy. We will retain your personal information for longer periods to the extent necessary to comply with our legal obligations, resolve disputes, and enforcement our legal agreements and policies.

6. Online Privacy and Cookie Policy

We collect information from users of our website including through the use of cookies.

- a. <u>Information We Collect About Users of Our Website and Social Media Sites</u>. We collect personal information about users through our website and our webpages on social media sites such as LinkedIn, which may include the following:
 - Information users provide when they enter information on our website, such as when submitting a "Contact Us" message (such as name and email address);
 - Information users provide when requesting literature such as applications or prospectuses (such as name, address, phone number, and email address);
 - Information users provide when posting content on social media sites;
 - Information users provide in their social media bio;
 - Information captured in our web logs such as device information (e.g. device brand and model, screen dimensions), unique identification numbers (e.g. IP address and device ID), and browser information (e.g. URL, browser type, pages visited, date/time of access); and
 - Information captured by cookies (see section on "Cookies and how we use them" below).

There may be times when such information is provided to our affiliates to enable us to receive services such as accounting, legal and compliance matters. Also, we provide such client information to other third-party service providers when it is essential for the servicing of your account (*i.e.*, transactional services). We may disclose such information to other third parties that we believe it necessary for the conduct of our business or where disclosure is required by law. We will subject such disclosures to confidentiality agreements if appropriate.

b. Cookies and How We Use Them

This website uses cookies to improve your browsing experience while you navigate through the website. A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an online site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences.

We categorize cookies as necessary and not necessary. Cookies that are categorized as necessary are stored on your browser as they are essential to the basic functionalities of the website.

Cookies that are not necessary include performance and targeting cookies and include third-party cookies that help us analyze and understand how you use this website.

These cookies will be stored on your browser only with your consent. You have the ability to opt-out of these cookies but this may have an impact on your browsing experience.

Ways that we use cookies and other tracking technologies include:

- To assist you in navigation;
- To analyze your use of our products, services or applications;
- To assist you with our promotional and marketing efforts;
- To maintain and enhance our website and the services and information we offer; and
- To analyze trends in our users' behavior.
- c. Website analytics and online tracking

We may share aggregated anonymous data concerning our users as collected through our website with certain third-party analytic services such as Google Analytics to better understand your use of our website and our services. Google Analytics collects information such as how often users visit the websites, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the websites to contextualize and personalize the ads of its own advertising network. Google's ability to use and share information collected by Google Analytics about your visits to the websites is restricted by the Google Analytics Terms of Service and the Google Privacy Policy. Google offers an opt-out mechanism for Google Analytics here: http://tools.google.com/dlpage/gaoptout.

You can change your privacy preferences regarding the use of cookies and similar technologies through your browser. Useful information about the technical aspects of cookies can be found at http://www.allaboutcookies.org.

As a general rule, we do not permit any third parties (such as advertisers) to install cookies on our websites or engage in behavioral advertising. However, our site contains links to other websites operated by third parties, including social media websites, such as LinkedIn. These third-party websites may collect information about you if you click on the link and may automatically record information about your browsing behavior every time you visit a website that has a social media button or link. Your interactions with these features are governed by the privacy policy of the company providing the feature, not by our online privacy policy. We do not control what information these third parties collect.

We do not track our customers over time and across third party websites to provide targeted advertising and, therefore, we do not respond to Do Not Track (DNT) signals. However, some third-party sites may keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such third-party sites, your browser may allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked.

7. Your Rights Under Federal Law

Federal banking and consumer protection laws provide you with certain rights with respect to personal information used to apply for and obtain financial services, such as to obtain a loan, and to open an account with us. These rights are explained in a privacy notice available here: www.taabl.co/privacy/GLBA

8. California Residents: Your Rights under the California Consumer Privacy Act (CCPA)

Under the CCPA, California residents are granted certain rights related to the personal information held by a business. If applicable, these rights include:

- a. <u>Right to Access</u>. You have the right to request the specific pieces of personal information we collected about you; the categories of personal information we collected; the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we share your personal information each as it pertains to our activities in the preceding twelve (12) months.
- b. <u>Right to Data Portability</u>. You have the right to request a portable copy of your personal information.
- c. <u>Right to Deletion</u>. You have the right to request that we delete your personal information (except as legally required or under exceptions identified in the CCPA).
- d. <u>Right to Nondiscrimination</u>. You have the right not to be discriminated against for exercising any of these rights under the CCPA.
- e. <u>Authorized Agent</u>. You have the right to have someone you authorize make a request on your behalf.

If the CCPA applies to you and you wish to exercise any of these rights please contact the us using the contact information provided below. We may need to seek further information from you to confirm your identity before we release any personal information or delete any personal information. As we do not sell your personal information, we are not providing you with the ability to opt-out of the sale of your personal information under the CCPA. If we decide to sell personal information in the future, we will post an appropriate notice and a method of opting out of the sale.

Further, we do not share your personal information with third parties for direct marketing purposes.

Please note that the CCPA does not apply to personal information that is governed by certain federal laws, such as the federal laws described in the proceeding section. Accordingly, the above-referenced rights under the CCPA do not apply to this data.

9. Children's Privacy

Our products and services are not intended for children or anyone under the age of 16. We do not knowingly collect, maintain, or process personal information from children without parental consent or another form of consent that may be required under applicable law.

10. Policy changes

We may update this Privacy Policy from time to time but at least once every 12 months. We will notify you of any changes by making the new Privacy Policy available to you in an appropriate manner, such as by email to the address specified in your account or through a notice on our website, prior to any changes becoming effective.

11.Contact

If you have any questions regarding this privacy policy, or wish to exercise any rights you may have under the CCPA or other applicable laws, please email us at support@taabl.co or by visiting <u>www.taabl.co/support</u>.

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