



**ATMOS**

**Privacy Policy**  
Effective 06/15/2023

This Privacy Policy explains how Atmos Financial, PBC (“**Atmos**”, “**we**”, “**us**” or “**our**”) collects, uses, discloses, and otherwise processes Personal Information (as defined below) in connection with www.joinatmos.com (the “**Site**”) and the related content, platform, services, mobile applications, web applications, and other functionality offered on or through the online services (collectively, the “**Services**”).

## **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 an individual. It does not include aggregated or de-identified information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

## **Personal Information Collected from Site Visitors and Account Holders**

We may collect the following Personal Information submitted to us by visitors to our Site and account holders:

**Contact Information**, including name, email address, telephone number, addresses, and communication preferences. We may also receive your contact information from your contacts who have participated in our referral program.

**Inquiry Information**, including information provided in custom messages sent through the forms, chat client, or contact information provided on our Site.

**Account Information**, including name, employer, email address, username and password, profile information, Social Security number, postal address, a photo of your US government-issued ID, telephone number, bank account number(s), bank account balance(s), other bank account information, and any other information you provided to us.

**Communications Information**, including photos, texts, videos, or any other information you upload and/or send to us or through our Services.

**Survey Information**, including information provided in any questions submitted through surveys, or content of any testimonials.

## **Personal Information Automatically Collected**

As is true of most digital platforms, we and our third-party providers may also collect Personal Information from an individual’s device, browsing actions and site usage patterns automatically when visiting or interacting with our Site, which may include **log data** (such as internet protocol (IP) address, operating system, browser type, browser id, the URL entered and the referring page/campaign, date/time of visit, the time spent on our Site and any errors that may occur during the visit to our Site), **analytics data** (such as the electronic path taken to our Site, through our Site and when exiting our Site, as well as usage and activity on our Site) and **location data** (such as general geographic location based on the log data we or our third-party providers collect).

We and our third-party providers may use (i) cookies or small data files that are stored on an individual’s computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, “**cookies**”) to automatically collect this Personal Information. For example, our Site uses Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”), to collect and view reports about the traffic on our Site. More information about the use of Google Analytics for these analytical and non-advertising purposes can be obtained by visiting Google’s privacy policy [here](#) and Google’s currently available opt-out options are available [here](#).

To manage cookies, an individual may change their browser settings to: (i) notify them when they receive a cookie, so the individual can choose whether or not to accept it; (ii) disable existing cookies; or (iii) automatically reject

cookies. Please note that doing so may negatively impact an individual's experience using our Site, as some features and offerings may not work properly or at all. Depending on an individual's device and operating system, the individual may not be able to delete or block all cookies. In addition, if an individual wants to reject cookies across all browsers and devices, the individual will need to do so on each browser on each device they actively use. An individual may also set their email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether they have accessed our email and performed certain functions with it.

For more information about your choices regarding online advertising, refer to the **"Your Choices About Online Ads"** section below.

### **Personal Information from Third Parties**

We also obtain Personal Information from third parties; which we often combine with Personal Information we collect either automatically or directly from an individual.

We may receive the same categories of Personal Information as described above from the following third parties:

**Banks:** Atmos may receive information about individuals, such as their name, physical address, and bank account information, from our bank partners.

**Payment Processors:** In order to provide certain features of the Services, Atmos may collect information such as bank account numbers, balances, and other information about your bank account(s) from payment processors that facilitate transfers to Atmos partner bank account(s) or through third-party secure access tools, such as Plaid.

**Social Media:** When an individual interacts with our Services through various social media networks, such as when someone logs in through a social network, "Likes" us on Facebook or follows us or shares our content on Google, Facebook, Twitter, or other social networks, we may receive some information about individuals that they permit the social network to share with third parties. The data we receive is dependent upon an individual's privacy settings with the social network. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services.

**Service Providers:** Our service providers that perform services solely on our behalf, such as survey and marketing providers, collect Personal Information and often share some or all of this information with us.

**Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement Personal Information we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with an individual.

**Publicly Available Sources:** We collect Personal Information about individuals that we do not otherwise have, such as contact information, employment-related information, and interest-in-services information, from publicly available sources. We may combine this information with the information we collect from an individual directly. We use this information to contact individuals, to send advertising or promotional materials or to personalize our Services and to better understand the demographics of the individuals with whom we interact.

### **Our Use of Personal Information**

We may use Personal Information we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to deliver the Services you have requested and to process transactions;
- Manage our organization and its day-to-day operations;
- Communicate with individuals, including via email, text message, social media and/or telephone calls;

- Request individuals to complete surveys about our organization, organizations we partner with, and Services;
- Market our Services to individuals, including through email, direct mail, phone or text message;
- Administer, improve and personalize our Services, including by recognizing an individual and remembering their information when they return to our Site;
- Process payment for our Services;
- Facilitate client benefits and services, including customer support through our command center services;
- Identify and analyze how individuals use our Site and Services;
- Conduct research and analytics on our client base and our Services;
- Improve and customize our Services to address the needs and interests of our client base and other individuals we interact with;
- Test, enhance, update and monitor the Services, or diagnose or fix technology problems;
- Help maintain the safety, security and integrity of our property and Services, technology assets and business;
- Defend, protect or enforce our rights or applicable contracts and agreements;
- Prevent, investigate or provide notice of fraud or unlawful or criminal activity; and
- Comply with legal obligations.

Where an individual chooses to contact us, we may need additional information to fulfill the request or respond to inquiries. 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 provided at that time.

### **Our Disclosure of Personal Information**

We may disclose Personal Information to operate our business and communicate with you, including in the following ways:

- **Affiliates:** We may share Personal Information with other companies owned or controlled by Atmos, and other companies owned by or under common ownership as Atmos, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.
- **Survey Providers:** We may share Personal Information with third parties who assist us in delivering our survey offerings and processing the responses.
- **Bank Partners:** We share Personal Information with our bank partners in order to provide certain features of the Services.
- **Nonprofit Partners:** We partner with nonprofit organizations, and may share Personal Information with them, such as when we process donations.
- **Marketing Providers:** We may coordinate and share Personal Information with our marketing providers in order to communicate with individuals about the Services we make available.
- **Customer Service and Communication Providers:** We may share Personal Information with third parties who assist us in providing our customer services and facilitating our communications with individuals that submit inquiries.
- **Other Service Providers:** In addition to the third parties identified above, we engage other third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, analytics services, administrative services.
- **Other Business As Needed To Provide Services:** We may share Personal Information with third parties that an individual engages with through our Services or as needed to fulfill a requestor transaction including, for example, payment processing services.
- 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.

— Legal Obligations and Rights: We may disclose Personal Information to third parties, such as legal advisors and law enforcement:

- o in connection with the establishment, exercise, or defense of legal claims;
- o to comply with laws or to respond to lawful requests and legal process;
- o to protect our rights and property and the rights and property of others, including to enforce our agreements and policies;
- o to detect, suppress, or prevent fraud;
- o to protect the health and safety of us and others; or
- o as otherwise required by applicable law.

— Otherwise With Consent or Direction: We may disclose Personal Information about an individual to certain other third parties or publicly with their consent or direction. For example, with an individual's consent or direction we may post their testimonial on our Site or service-related publications.

### **If You are a Resident of the State of Nevada**

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. Although we do not currently sell covered information, please contact us at [privacy@joinatmos.com](mailto:privacy@joinatmos.com) to submit such a request.

### **Annual Privacy Notifications**

On an at least annual basis, Atmos will notify you via email what, if any of your non-public, personal information is being shared.

### **Your Choices About Online Ads**

We support the self-regulatory principles for online 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 <http://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 advertising partners, please follow the instructions at [www.aboutads.info/choices](http://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 on our websites or 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.

### **Children's Personal Information**

Our 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 an individual is under the age of 13, they should not use our 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.

### **Links to Third-Party Website or Services**

Our Site and Services may include links to third-party websites, plug-ins and applications. Except where we post, link to or expressly adopt or refer to this Privacy Policy, this Privacy Policy does not apply to, and we are not responsible for, any Personal Information practices of third-party websites and online services or the practices of other third parties. To learn about the Personal Information practices of third parties, please visit their respective privacy notices.

### **Updates to This Privacy Policy**

We will update this Privacy Policy from time to time. When we make changes to this Privacy Policy, we will change the date at the beginning of this Privacy Policy. If we make material changes to this Privacy Policy, we will notify individuals by email to their registered email address, by prominent posting on this Site or our Services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

### **Contact Us**

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to [support@joinatmos.com](mailto:support@joinatmos.com). Alternatively, inquiries may be addressed to:

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