

**Last Updated: 10/01/2023**

This Privacy Notice applies to the Goalsetter App and the associated financial savings and spending features (collectively, the “Services”) owned and operated by Students of Wealth, LLC., d/b/a Goalsetter. It is provided to help inform users of the Services (“Users,” “you,” “your”) about how we may collect, use, and share your personal information. It also explains your choices and rights with respect to the personal information we may collect about you and about your children whose personal information you may choose to share with us in order to access and use the Services.

By accessing or using the Services, you acknowledge that you have read and understood this Privacy Notice. If you do not agree with this Privacy Notice, please do not access, or use Services.

### **1. PERSONAL INFORMATION WE COLLECT FROM ADULTS AND KIDS**

In order for you to create a profile and use the Services, we need to collect and process some personal information. Personal information (“Personal Information”) is information that identifies, relates to, describes, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with you, your children, or your household.

Depending on your use of the Services, that may include:

1. Your first and last name, date of birth, email address, phone number, street address, and your Social Security number. We use this information to create your Goalsetter account, verify your identity and for the creation of your account with our financial institution partners as necessary for your engagement with the Services. In addition, this information will be used to generate tax documents and other reports or Services, as needed.
2. Information about your financial institution, including the account number that you would like to attach to your account within the Services. We use this information to help facilitate your savings and purchase requests
3. Your username and password details, which we use to provide you with access to the Services
4. Details of your financial goals and the amount of each goal
5. Your child’s legal first and last name, date of birth, profile name, phone number and email address
6. Communications, including voice data, you send or provide to us (for example, when you ask for support, send us questions or comments, or report a problem)
7. Information that you submit to us in the form of updates, notes or messages on your profile
8. Additional information you may choose to provide for yourself or your child, including a biographical information and a profile image.

## **2. PERSONAL INFORMATION WE COLLECT FROM CHILDREN UNDER AGE 13:**

Children under age 13 are not permitted to create an account without first receiving an invitation code authorized by a parent or legal guardian. We do not knowingly collect Personal Information from children under age 13 without first obtaining prior verifiable consent from the parent or legal guardian. We collect only the minimally required Personal Information from children under age 13, and we do not condition a child's participation in the Services on collection of more Personal Information than is necessary in order to provide them with the Services.

Should we learn that we have inadvertently collected Personal Information from a child without prior, verifiable consent from the parent or legal guardian, we will take steps to promptly delete such information.

### Usage Information

When you or your child access the Services, we may automatically collect certain information such as your Internet Protocol ("IP") address associated with your browser, and your device ID. We may also collect information such as login timestamp, the operating system of the device and language, country, as well as areas in the Services visited most frequently, time spent, and features accessed most often ("Usage Information"). Usage Information is used to help us administer the Services and diagnose problems. We also aggregate and analyze Usage Information to better understand how the Services are used and to help us improve the Services. When Usage Information is in a format that identifies an individual, we treat it as Personal Information in accordance with this Privacy Notice.

To collect Usage Information, we use cookies. Cookies are small data files sent by a website and stored on the computer or device at the request of that site. Cookies store information related to your browser to enable us to recognize the browser on return visits to the Services, to remember your preferences, to understand how our Users interact with the Services, and to help improve the Services.

By using the Services, you agree to the use of these technologies.

### Third Party Cookies and Similar Technologies:

We use third-party service providers to assist us in collecting and understanding Usage Information. Most browsers can be set to detect browser cookies and similar technologies and to let a user reject them, but refusing cookies and similar technologies may make it difficult to use the Services. To learn more about browser cookies, including how to manage or delete them, refer to the Tools, Help or similar section of your web browser.

### **3. USES OF YOUR PERSONAL INFORMATION**

We will not sell or rent Personal Information. We use your Personal Information as described above and to:

1. Identify you when you sign into your account.
2. Enable us to provide you with the Services, which may include our financial institution partners.
3. Administer your account with us.
4. Enable us to respond to any question you ask through the Services.
5. Analyze the use of the Services and the User demographics to improve our content and Services.
6. Protect our rights and safety and that of our Users, or as necessary in the event of a court order, regulatory inquiry or other lawful request. Provided, however, that unless legally prohibited, we will direct any such request to the User or notify the User before responding.
7. Investigate or otherwise address any known or suspected violation of our terms of use, fraud, or other unlawful use, including to share Personal Information with entities assisting us in any investigation and as may be required by law.
8. Share with a new entity in the event of a reorganization, merger, sale, assignment, bankruptcy, or similar business change, to be used in accordance with this Privacy Notice.
9. Provide you with updates and offers about the Services, which you may unsubscribe to at any time as noted below.
10. Use for other purposes that we may disclose to you when we request your information.

### **4. THIRD PARTIES**

We may engage with third party partners to facilitate our delivery of the Services and to provide certain features on our behalf, such as data hosting, analytics, content delivery, maintenance, security, and similar functions. These third parties may require a certain amount of information, including Personal Information, in order to deliver their services on our behalf.

We do not disclose more Personal Information than is necessary for a third party to facilitate our delivery of the Services or to provide certain features on our behalf. Third parties may only use Personal Information for the sole purpose of providing their services to us in support of our delivery of the Services.

### **5. SECURITY**

We implement physical, administrative, and technical safeguards to help protect the confidentiality, integrity, and availability of Personal Information. We host Personal Information in secure, third-party cloud-based environments that use firewalls, encryption of

Personal Information in transit and at rest, and other industry-standard technologies in an effort to prevent interference or access from outside intruders. The Internet, however, is not perfectly secure and we are not responsible for security breaches not reasonably foreseeable and reasonably within our control.

You are responsible for maintaining the confidentiality of your Username and password. If you become aware of any unauthorized use of an account, loss of your or your child's account credentials or suspect a security breach, notify us at [hello@goalsetter.co](mailto:hello@goalsetter.co).

## **6. DATA RETENTION**

We retain Personal Information for as long as is necessary to provide the Services for the purpose for which it was provided or otherwise for as long as is legally required of us.

We may create and retain deidentified data by removing, obfuscating and/or otherwise altering the Personal Information. We may use de-identified data only for legally permissible purposes and may retain such data for longer periods than may be legally required.

## **7. EMAIL OPT-OUT**

We send emails to you with information about our Services that we believe may be of interest. You may opt out of receiving email messages from us by contacting us at [hello@goalsetter.co](mailto:hello@goalsetter.co) or by clicking on the "unsubscribe" link found at the bottom of every marketing related email that we send. We do not send marketing emails to children under 13.

If you have opted out of receiving marketing communications from us, we will still send you Service-related communications.

## **8. HOW YOU MAY MODIFY YOUR PERSONAL INFORMATION**

You may modify or delete the Personal Information you have provided to us by logging in and updating your profile.

Parents of children under age 13 have the right to request a copy of the Personal Information or types of Personal Information we have collected from your child, to request that we not collect further Personal Information from the child, or to request that we delete the Personal Information we have collected from the child. To make such a request, please email us at [hello@goalsetter.co](mailto:hello@goalsetter.co). We will take steps to confirm your identity before we are able to fulfill your request.

## **9. UPDATES TO THIS NOTICE**

As our Services evolve, we may make changes to this Privacy Notice. We will alert you to changes by providing notice within the Services or otherwise as required by law.

The “last updated” note at the top of this Notice indicates when it was last revised, and updates will become effective when they are posted.

## **10. QUESTIONS**

If you have questions about our privacy practices, please contact us at [hello@goalsetter.co](mailto:hello@goalsetter.co).