

# Privacy Policy

This Topia Privacy Policy (the “**Privacy Policy**”) describes the policies and procedures we use to collect, utilize, disclose, share and protect your Personal Information. We refer to Topia as “**Topia**”, “**we**” or “**us**”. Together with our [Terms of Use](#), this Privacy Policy governs your use of our platform and services.

Topia is committed to the protection of our Visitors’ and Users’ (referred to as “**you**” or “**your**”) privacy. We know that keeping your information secure and confidential is critical to earning and keeping your trust. We will never rent, sell or trade your Personal Information.

## *How to Use this Privacy Policy*

This Privacy Policy describes how we collect and use your Personal Information and how we address other privacy matters, such as deletion of your Personal Information upon request and opting-out of marketing communications. We also detail methods to contact Topia if you have any privacy questions, comments or feedback.

The information that we collect, and how we use it, depends on your relationship with us. This Privacy Policy is organized based on those different types of relationships - Visitors and Users.

- **Visitors:** Individuals who visit our public website without logging into an account or using our services.
- **Users:** Individuals who establish an account with us or otherwise use our service offerings, including the Topia App.

## *How We Collect & Use Your Information*

“**Personal Information**” means your personally-identifiable information, such as your name, email or mailing address, phone number, account credentials (User ID and passwords), and any other information that can be used to personally identify you.

We also collect and use other information that we obtain from your activities using our services. This includes information that you do not explicitly provide to us, but which may be implicitly provided to us as part of such activities. See the Visitors use case below for more information.

The following describes in further detail the information we collect at various stages of our relationship with you.

## Visitors

When you visit any of our websites, including our Community, or download our app, we consider you a Visitor. This section describes our privacy practices relating to Visitors.

What do we collect?	Why do we collect it?	Can you limit this collection?
Topia Cookies	<ul style="list-style-type: none"><li>To recognize you when you make a return visit and deliver a consistent overall experience</li></ul>	Most browsers allow you to delete or limit cookies.
Third-Party Tags and Cookies	<ul style="list-style-type: none"><li>To measure our marketing effectiveness</li></ul>	Most browsers allow you to delete or limit cookies, including third-party cookies. However, you may not be able to limit marketing tags entirely unless you do not visit our sites.
Internet Protocol (IP) Address	<ul style="list-style-type: none"><li>As part of the basic function of the Internet</li><li>To measure who is visiting us and where they are from</li></ul>	The only way to avoid this is not visiting our sites.
Browser Metadata  Such as browser type, version, your operating system, system language, etc.	<ul style="list-style-type: none"><li>As part of the basic function of the Internet</li><li>To ensure we maintain a positive website experience for popular browsers</li></ul>	Browsers communicate this automatically. Some third-party extensions may allow you to limit this.

## Users

When you create an account on our app and begin using our services, we consider you a User. This section describes our privacy practices related to Users. This information is collected in addition to what was described for Visitors.

What do we collect?	Why do we collect it?	Can you limit this collection?
Email and Password	<ul style="list-style-type: none"><li>• To establish your account and allow you secure access to it</li><li>• Email you about service updates, maintenance activities, security notifications and other account related information</li><li>• Email you about service and/or product offerings, surveys and other marketing promotions</li><li>• Allow our Support team to contact you if needed</li></ul>	<p>No, this is required to have a functioning account.</p> <p>You can opt out of marketing emails (see the Opt-Out section).</p>
<p><b>[Optional]</b></p> <p>Financial Information</p> <p>Includes information you provide about your financial planning goals, such as your income, assets, liabilities, monthly savings, life events and other related information.</p>	<ul style="list-style-type: none"><li>• Recommend Topia products and services that may be of interest to you</li><li>• Customize your User experience</li><li>• Conduct anonymized aggregated research on personal finance trends</li></ul>	<p>Yes, these are optional services which you are free to use or not use.</p>

<p><b>[Optional]</b></p> <p>Financial Account Information</p> <p>For third-party financial accounts you link, this includes your account credentials, passwords, security questions, transactions, balances, assets held, statements and other account information.</p>	<ul style="list-style-type: none"> <li>● Provide you a holistic view of all of your finances in our Dashboard</li> <li>● Provide you our free financial planning tools</li> <li>● Allow automatic background refreshes of your data so that your Dashboard is always up to date</li> <li>● Recommend Topia products and services that may be of interest to you</li> <li>● Customize your User experience</li> <li>● Conduct anonymized aggregated research on personal finance trends</li> </ul>	<p>Yes, these are optional services which you are free to use or not use.</p>
<p>Product Use Information</p>	<ul style="list-style-type: none"> <li>● Monitor and maintain system performance</li> <li>● Identify most popular features and inform new features development</li> <li>● Personalize your experience with Topia</li> <li>● Recommend Topia products and services</li> </ul>	<p>No, if you are a User we will collect this information.</p>

***What Information Do We Share and Why?***

We do not rent, sell or trade your Personal Information. We do share some information as described in the table below.

## Personal Information

Sharing Category	What do we share and why?
<i>Our Service Providers</i>	Like most businesses, we use third-party service providers to deliver some of the services mentioned in this Privacy Policy. In doing so, we provide some of your data (including your Personal Information) to those third-party service providers, on a need to know basis.
<i>Security, Legal &amp; Regulatory Requirements</i>	We also reserve the right to disclose information about you that we believe is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the services we provide and any facilities or equipment used to make those services available, (v) comply with any law or regulatory requirement, including pursuant to a subpoena, court order or other legal process, or (vi) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

## Anonymized Information

We may share anonymized information that is derived from information you provide to us as explained below. Anonymized information is information that does not include any personally identifiable information.

## ***Additional Privacy Information and Your Privacy Rights and Resources***

### **Our Use of Google Analytics**

We use Google Analytics to help us market our products and services to you, understand how you interact with our website and mobile app, and improve the User experience. To do this, we share a unique identifier with Google. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, see “How Google uses data when you use our partners’ sites or apps”, linked [here](#). You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Add-On, [here](#).

## Our Use of Tags, Pixels, Cookies and Other Trackers

Tags, pixels and cookies are bits of code that we use to gather information to operate and measure engagement with our site. These generally fall into two categories:

- **Marketing Attribution:** This allows us to track the efficacy of advertising we run on other sites. For example, marketing pixels send a small amount of information when triggered by specific events, such as when a user registers on our site after clicking a promotional link on another site. To do this, the pixel uses a unique identifier that does not contain personally identifying information to connect that data (registration) back to the action (clicking on the link).
- **User Experience:** Topia uses Appsflyer, Mixpanel and Intercom to help us determine which features are most popular with our users, provide content and offers that are relevant to a user's financial situation or site engagement, market our products and services to you, and identify errors or other technical issues on our site.

## How to Request Deletion of the Personal Information We Collect

Topia allows you to delete your account by emailing [contact@topia-app.com](mailto:contact@topia-app.com). We will retain information on deleted accounts as required for legal, regulatory and security purposes.

## Opt-out Information

If you request to be added to our Opt-out lists, we will keep your Personal Information on those Opt-out lists until you request to be removed from such lists. You can opt-out of the following:

- Promotional or Product Notification emails.

## “Do Not Track” Signals

Some modern web browsers have the ability to activate a “Do Not Track” signal. At this time, Topia does not respond to “Do Not Track” signals.

## Email Records

Topia keeps business records, including emails, for five years to meet our regulatory compliance requirements. This includes any email you send to our privacy, security or support teams.

## Data Residency

Our services and data are hosted in the United States and are intended for individuals located within the United States.

## **US State Residents Privacy Notices**

To exercise any of your rights described below, please contact us at [contact@topia-app.com](mailto:contact@topia-app.com).

### *Nevada Residents*

We are providing you this notice under Nevada state law. You may be placed on our internal Do Not Call List by contacting us.

In addition to contacting us, Nevada residents can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, in writing at 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; by calling (702) 486-3132; or by emailing: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

### *Vermont Residents*

Under Vermont law, we will not share any Personal Information we collect about Vermont residents with third parties, unless the law allows.

### *California Residents*

Residents of California have the right to request a disclosure describing what types of Personal Information (if any) we have shared with third parties for their direct marketing purposes, and with whom we have shared it, during the preceding calendar year.

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) provides a number of rights to California consumers. For a full description of your rights under the CCPA, please see Appendix A.

## **Protecting Children’s Privacy Online**

Topia is not aimed at individuals under the age of thirteen, and those children should not provide Personal Information through our websites or applications. We do not knowingly collect information from children under 13 without parental consent. For more information about the Children’s Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website.

## **Modifications to our Privacy Policy**

We change our privacy practices from time to time as the need arises. When we do, we will revise this Privacy Policy.

### **Privacy Questions, Comments or Feedback?**

Please email us at [contact@topia-app.com](mailto:contact@topia-app.com).

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## Appendix A

### California Consumer Privacy Act (“CCPA”) Disclosures

#### **Who does the CCPA apply to?**

The CCPA provides certain rights to California residents.

#### **What rights do I have under the CCPA?**

Broadly, the CCPA grants California residents the following rights:

1. a right to request that a business disclose the personal information that it collects, uses, discloses and sells;
2. a right to request that a business delete the personal information that it has collected from them;
3. a right to opt-out of having their personal information sold by a business; and
4. a right not to receive discriminatory treatment by a business for exercising their rights under the CCPA.

#### **What personal information does Topia collect about California consumers?**

The table below details the categories of personal information Topia has collected over the past 12 months, as well as the source categories from which the information was collected, the purpose for which the information is collected, and the categories of third parties with whom Topia shared personal information.

Please note that we also detailed the types of information we collect earlier in our Privacy Policy. However, the CCPA requires that we provide this information with reference to certain categories described in the CCPA.



Category of Personal Information	Examples
<p><i>Identifiers such as a real name, alias, unique personal identifier, online identifier Internet Protocol address, email address, account name.</i></p> <p><i>Categories of Sources: Y, SP, TP</i></p>	<p>You provide this information when creating an account or adding accounts.</p>
<p><i>Personal information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, bank account number, credit card number, debit card number, or any other financial information.</i></p> <p><i>Categories of Sources: Y, SP, TP</i></p>	<p>You provide this information when creating an account or adding accounts.</p> <p>We do not store account numbers, credit or debit card numbers or login credentials for accounts that you link to Topia.</p>
<p><i>Characteristics of protected classifications under California or federal law.</i></p> <p><i>Categories of Sources: Y</i></p>	<p>You provide your age when creating an account.</p>
<p><i>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</i></p> <p><i>Categories of Sources: Y, SP</i></p>	<p>If you have added accounts to Topia, we have collected transaction information reflected in those accounts.</p>
<p><i>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a</i></p>	<p>We collect your IP address and cookies from your browser to recognize you and deliver a consistent experience when you visit our site and to measure the effectiveness of our marketing. We also</p>

*consumer's interaction with an Internet Web site, application, or advertisement.*

collect information about how you interact with our website.

*Categories of Sources: Y*

Note that we do not collect education, biometric or geolocation information.

### **Categories of Sources of Information**

(Y) Most of the personal information that we have is provided through our website and/or app, including information you enter into and information provided by your web browser or device.

(SP) We receive information from service providers, such as data analytics providers or financial account aggregators.

### **Business or Commercial Purpose for Collecting the Personal Information**

We collect personal information for one or more of the following purposes:

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the

business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

### **How Can I Exercise My Rights Under the CCPA?**

Email [contact@topia-app.com](mailto:contact@topia-app.com).

### **How Can I Designate an Authorized Agent to Exercise My Rights Under the CCPA?**

You may use an authorized agent to submit a request on your behalf. To do so, the authorized agent must provide a copy of your signed authorization to [contact@topia-app.com](mailto:contact@topia-app.com). You will also be required to verify your identity directly with us and confirm that you have provided the authorized agent with your permission to submit a request on your behalf.

### **Contact Information**

If you have any questions about your rights under the CCPA, please email [contact@topia-app.com](mailto:contact@topia-app.com)

### **Third Party Services**

We use Plaid Inc. (“**Plaid**”) to gather End User’s data from financial institutions. By using our service, you grant us and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#).