

Ouro Notice at Collection (for California Residents)

Updated: January 17, 2025, Effective: January 17, 2025

This Notice at Collection (“Notice”) applies to Ouro Global, Inc., Ouro International, Inc., Ouro Insurance Agency, LLC (“Ouro Insurance”), and their affiliates (collectively, “Ouro” “we” or “us”). If you’re an Ouro consumer, please see our [Ouro U.S. Privacy Notice](#).

About Ouro

Ouro is a financial technology company, not a bank or insurance company. Ouro is an authorized agent and program manager for Netspend® and other bank products issued by Pathward®, National Association (“Pathward”), Republic Bank & Trust Company, (“Republic”), The Bancorp Bank, N.A., (“Bancorp”) and Texas First Bank (“TFB”); Members FDIC (“Bank”). Ouro Insurance is a licensed producer agent for the Chubb Group of Insurance Companies (“Chubb” or “Insurance Provider”).

Ouro understands that consumers care about privacy. This Notice describes the types of personal information we collect, how we use the information, with whom we may share it, and the choices available to you. We also describe measures we take to protect the security of the information and how you can contact us about our privacy practices. This Notice does not apply to the practices of third-party websites, services, or applications, including third parties with whom we partner. Ouro is not responsible for the privacy policies and practices of third-party services.

If you are a cardholder or have applied for a card, the principal privacy notice governing your card belongs to the Bank issuing your card. Please see the back of your card or the card program marketing materials for the name of your Bank.

Your Notice at Collection

As a California resident, you have rights regarding your “Personal Information”. Under the California Consumer Privacy Act (“CCPA”), as amended and expanded by the California Privacy Rights Act (“CPRA”), TITLE 1.81.5. California Consumer Privacy Act of 2018 [1798.100 - 1798.199.100], “Personal Information” means any 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, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state

identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. “Personal Information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

1. PERSONAL INFORMATION WE COLLECT

In connection with your application, Ouro may collect personal information about you as described below. Ouro collects your personal information to the extent that you disclose it to Ouro directly or through third parties such as recruiting platforms, job-posting sites, talent professionals, or representatives (e.g. attorneys). Ouro also collects certain personal information from you automatically when you access our network, electronic communication systems, or internal services. Ouro also may generate or infer personal information about you.

1. Information We Collect:

We collect the following categories of personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”).

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Identifiers such as a real name, signature, postal address, physical characteristics or description, unique personal identifiers (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; photographs and images, customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, physical address, internet protocol	Yes

	<p>address, email address, account name, social security number, driver’s license number or state identification card number, passport number, debit card number, credit card number, or any other financial information, medical information, insurance policy number, insurance claim number, health insurance information, and other similar identifiers. Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under California or federal law	<p>Characteristics of protected classifications under California or federal law, such as race, color, national origin, age, sex, gender, marital status, citizenship status, and military and veteran status;</p>	Yes
D. Commercial information	<p>Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.</p>	Yes
E. Biometric information	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	No
F. Internet or other similar network activity	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	Yes
G. Geolocation data	<p>Physical location or movements.</p>	Yes

H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes, related to employees only
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes, related to employees only
K. Sensitive Personal Information	<p>Government ID, account access information, precise geolocation data, sexual orientation, racial or ethnic origin, religious or philosophical beliefs, union membership, citizenship and immigration status.</p> <p>We collect and process Sensitive Personal Information for the purposes disclosed at the time we collect this information. We do not process this information for purposes other than the purpose for which it was originally collected unless required by law. We use and process Sensitive Personal Information collected from California employees, job applicants or vendors (including racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status) to comply with laws including anti-discrimination laws and disability accommodation laws. We use Sensitive Personal Information from other consumers (including racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status) to provide disability</p>	Yes

	accommodations. We also use sensitive personal information for the purposes listed in this Notice.	
L. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

Personal information does not include publicly available information from government records, de-identified or aggregated consumer information and Information excluded from the CCPA/CPRA's scope.

Treatment of Sensitive Personal Data. Under California law, “sensitive personal information,” includes government identifiers, precise geolocation, information concerning sexual orientation, racial or ethnic origin, religious or philosophical beliefs, and union membership, a consumer’s citizenship and immigration status.

You have the right to limit our processing of your “sensitive data for the purpose of inferring characteristics about you. We may collect or process your sensitive personal information for the purpose of inferring characteristics about you, under the following conditions:

- only as necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.”;
- to help ensure security and integrity to the extent the use of the consumer’s personal information is reasonably necessary and proportionate for these purposes.
 - Short-term, transient use as part of your current interaction with us, provided that we do not disclose your personal information to another third party and do not build a profile about you or otherwise alter your experience outside the current interaction with the business.
 - Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.

- 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.

Should we seek to process sensitive personal information for uses outside these categories and to infer characteristics about you, we shall (1) provide a notice to you explaining those uses and (2) allow you to opt out of those uses. If you exercise your right to limit our use or disclosure of sensitive personal information, we shall refrain from using or disclosing this information and wait at least twelve (12) months before requesting you again to authorize the use or disclosure of such information for additional purposes.

2. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you, such as when you sign up for an account or contact member services, or participate in, sweepstakes, promotions, or research or survey activities;
- Our Bank Partners;
- Your devices, when you use our Site or App;
- Your family or friends, such as when they provide us with your contact information by choosing to share their phone contacts with us;
- Payment processors;
- External banks (i.e., banks other than our Bank Partners) if you link a non Ouro-serviced account;
- Our affiliates and subsidiaries;
- Vendors who provide services on our behalf;
- Our joint marketing partners;
- Our business partners (such as referring websites);
- Online advertising services and advertising networks;
- Data analytics providers;
- Government entities;
- Operating systems and platforms;

- Social networks;
- Data brokers;
- Data aggregators, such as Plaid.

In order for Ouro to receive your information from a lead generation partner, you must have opted-in to the partner sharing your information for direct marketing purposes or the partner may have collected your information from publicly available sources. Ouro keeps a record of your opt-in to ensure that we are not marketing to prospects without consent.

If you have received direct marketing from Ouro, there are cases where Ouro is not able to determine a prospect's current contact information with the information provided by our lead generation partners. In those cases, Ouro uses third-party identity resolution service providers in order to verify the address and aid us in determining whether to use the lead. In the past 12 months, Ouro has shared contact information with these third-party service providers. Our identity resolution service providers are contractually not permitted to use your information for any other purpose.

Ouro does not Sell Personal Information as that term is defined in the CCPA/CPRA.

2. HOW WE USE OR DISCLOSE PERSONAL INFORMATION WE COLLECT

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with information, products or services that you request from us
- To provide you with email alerts and other notices concerning our products or services, that may be of interest to you
- To improve our website and applications to present its contents to you
- For testing, research, analysis and product development
- To ensure security and integrity of our products and services by detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- As described to you when collecting your personal information or as otherwise set forth in the CCPA/CPRA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. During the preceding twelve (12) months, we may have disclosed your personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers, including employers for pay cards
- Marketing partners, subject to consumer permission
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you

3. SELLING OR SHARING OF PERSONAL INFORMATION

We do not sell personal information for monetary or other consideration as defined by CCPA/CPRA.

Sharing your personal information means making it available to a third party so that they can use it to display targeted or cross-context behavioral advertisements to you. Cross-context behavioral or targeted advertising means that we display an advertisement to you that is selected based on personal information about you that we obtained or inferred over time from your activities across other companies' websites, applications or online services that we use to predict your preferences or interests. Targeted advertising does not include using your interactions with us or information that you provide to us to select advertisements to show you. In the preceding twelve (12) months, subject to your approval, we may have shared personal information for cross context behavioral marketing purposes.

We do not sell nor share the personal information of consumers under 18 years of age.

California Specific Disclosures:

Ouro does not "sell" your personal information and only discloses your information for a valid "Business Purpose" as those terms are defined by the CCPA/CPRA in the context of your relationship with the Company. If you use Ouro products or services that information is governed by the [Ouro U.S. Privacy Notice](#).

Ouro may retain personal data for as long as necessary to carry out and support applicant functions and activities, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as business expectations, the sensitivity of the data, and our legal or contractual obligations.

4. YOUR CHOICES

Where required by law, we offer you certain choices in connection with the personal information we have about you (e.g. access, deletion, correction). You have the right to opt out of the selling or sharing of your data and to limit the use of your Sensitive Personal Information. You can act on those choices by submitting a privacy request to Ouro at P.O. Box 2136, Austin, TX 78768-2136, email: customerservice@netspend.com, Tel: 1-866-387-7363. We may request certain information to verify your identity to complete your request.

5. QUESTIONS ABOUT THIS NOTICE

If you have questions about this Notice, please contact us at customerservice@netspend.com.