

PRIVACY POLICY

Last updated: July 01, 2020

This privacy policy (this "Privacy Policy") explains how Personal Information (as such term is defined below) is collected, used, stored, and disclosed by **Thrive Savings, Inc ("Thrive")**. This Privacy Policy applies to consumer users (individually referred to as "you") of our websites, applications, and other online services to which this Privacy Policy is posted (collectively, our "Services"). Thrive is the controller and is responsible for the Services and your Personal Information.

This Privacy Policy is part of our [Terms of Service](#). **By accessing or using our Services, you agree to this Privacy Policy and our Terms of Service.** The provisions contained in this Privacy Policy supersede all previous notices and statements regarding our privacy practices with respect to our Services. If you do not agree to every provision of this Privacy Policy and our Terms of Service, you may not access or use our Services.

The term "**Personal Information**" as used in this Privacy Policy shall mean

- (a) any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you, or
- (b) where applicable, any "nonpublic personal information" as defined under the Gramm-Leach-Bliley Act.

Application of this Privacy Policy

This Privacy Policy applies to your use of (regardless of means of access) our Services. You may access or use our Services through a desktop, laptop, mobile phone, tablet, or other consumer electronic device (each, a "Device").

What Does This Privacy Policy Cover?

This Privacy Policy covers Thrive Savings' treatment of personal information that Thrive gathers when you access or otherwise use the Apps. However, if you are a customer of, or applicant to, our services, your personal information is subject to our separate [GLBA Privacy Notice](#) and not to this Privacy Policy. Please refer to that [GLBA Privacy Notice](#) for information regarding the use and disclosure of your personal information.

This policy also does not apply to the practices of companies that Thrive does not own or control (including any third-party products or services used for logging into the Apps or our services or that are otherwise integrated with the Apps or our services), or to individuals that Thrive does not employ or manage.

Personal Information Collection, Use and Disclosure

The only personal information we receive from non-customers or applicants is analytics information (e.g., IP address, device ID, pages viewed) collected from visitors to our website or those who download our mobile applications, or information that you voluntarily provide to us.

We may use and disclose such analytics information as follows:

1. As reasonably required to answer any inquiries or take action upon any requests.
2. Business transfers: In the event of a merger, dissolution, reorganization, or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Privacy Policy.
3. Legal requests: In response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas to ensure we are in compliance with applicable law or as otherwise (i) disclosed to you at the time of collection or (ii) with your consent.

Access, Deletion, and Updating Personal Information

If you have any questions about viewing or updating information we have on file about you, please contact us at help@thrivesavings.com.

Do Not Track

We currently do not honor “Do Not Track” or similar signals or headers.

Changes to this Privacy Policy

Thrive may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used (as set forth by the “Last Updated” date above). If we make changes in the way we use personal information, we may notify you by posting an announcement on our website or sending you an email (or as otherwise required under applicable law). Users are bound by any changes to the Privacy Policy when visiting or using the Apps after such changes have been first posted.

Questions or Concerns

If you have any questions or concerns regarding privacy in connection with the Apps or our services, please contact us at help@thrivesavings.com.