

# Origin Privacy Policy and Notice Form

Last Updated: April 26, 2021

Welcome to the Privacy Policy for Blend Financial, Inc., ("Origin"). In this Privacy Policy, we describe in detail our commitment to protecting your personal data. We consider this to be a vital part of our relationship with you. We commit that we will not share your personal data unless you have asked us to share, we have told you in advance that we will share as part of providing our services, we have removed information that could identify you, or legal rights are affected.

## **WHAT THIS DOCUMENT COVERS**

The Origin Privacy Policy applies to users of our website (useorigin.com) and of our products and services opened and operated through our website. We refer to our website, products and services in this Privacy Policy collectively as our Services. This Privacy Policy describes the personal data that we collect from you, how we use this data, and how we protect this data. By using our Services, you are agreeing to our collection and use of your personal data as described in this Privacy Policy.

The Origin Privacy Policy does not apply to third-party services that we simply refer you to, and that you may enroll into or access through a third-party website.

This document also includes the current Origin Privacy Disclosure Form summarizing how we share information and your rights to opt-out. We may also distribute this same Disclosure as a separate Notice, from time to time.

The current version of this document does not include a California Consumer Privacy Act ("CCPA") Privacy Statement applying to residents of the State of California, since Origin is currently not subject to CCPA requirements. A CCPA statement will be added to this document when Origin becomes subject to the CCPA.

Please note that by applying for an Origin Deposit Account, you are directing us to share information about you (including your personal information) with BBVA USA, Member FDIC ("BBVA"), the bank that provides the account. BBVA may use and disclose your information in accordance with the BBVA agreements and disclosures that will be made available to you at the time you apply for the Origin Deposit Account. You should review those BBVA agreements and disclosures for more information.

## **PRIVACY POLICY**

### **How Our Services Work**

Our Services are designed to create the best place to manage your financial life through the combination of an intuitive digital platform and human financial planners. Our Services enable you to connect and view your various online or app-based financial and finance related accounts in one place. Our Services may also permit you to analyze these accounts, set up automated savings or debt payments, transfer funds between your accounts, and receive offers relating to various financial products and services, including loans, payments, money transmission, and passive investment and

savings vehicles from third parties.

### **What Information We Collect**

We may collect your personal data and other information from you in the following circumstances:

**Information You Provide.** We collect personal data from you when you voluntarily provide this information to us, such as when you register for access to our Services, contact us with inquiries, link your accounts, and respond to offers from third parties, or when you authorize our Services to collect this information about you from your financial institution or from credit bureaus. Personal data that you voluntarily provide may include your name, address, email address, phone number, tax identification number (such as U.S. social security number) or other government-issued ID number, date of birth, annual income, and other information about your finances and employment.

*Please note that if you are located outside of the United States, by providing this information to us, you acknowledge and agree that this personal data may be transferred from your current location to the offices and servers of Origin and the authorized third parties referred to in this Privacy Policy, located in the United States.*

Other Information We Collect:

- **Non-Identifiable Data.** When you interact with our Services, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. We may store this information itself or it may be included in databases owned and maintained by our agents or service providers. Our Services may use this information and pool it with other information to track, for example, the total number of visitors to our website, the number of visitors to each page of our website, and the domain names of our visitors' Internet service providers. ***It is important to note that your personal data is not available or used in this process.***

- **Cookies.** In operating the Services, we may use a technology called "cookies." A cookie is a piece of information that the computer hosting our Services gives to your browser when you access our Services. Cookies help provide additional functionality to our Services and help us to analyze usage more accurately. For instance, our website may set a cookie on your browser that allows you to access our Services without needing to remember and then enter a password more than once during a visit to our website. In all cases in which we use cookies, we will not collect personal data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of additional features of our Services.

- **Aggregated Personal Data.** In an ongoing effort to better understand and serve our users, we may conduct research on our customer demographics, interests, and behavior based on personal data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated user

statistics in order to describe our Services to current and prospective business partners, and to other third parties for other lawful purposes.

- **Third Party Analytics.** We may allow third party service providers to use cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of the Services. These third party service providers help us analyze how our users use our Services, and can enhance your experience when you use our Services.

### **How We Use Your Information**

We will use the personal data you give us to provide our Services to you in a way that is consistent with this Privacy Policy. Please note that if you provide your personal data for one part of our Services, we may use it for another part of our Services. For example, if you contact us by email, we may use the personal data you have submitted to us to provide you with the answer to your question or to resolve your problem. Also, if you provide personal data in order to obtain access to our Services or to link your financial accounts, we will use your personal data to provide you with access to these Services and features and to monitor your use of these Services.

We may also use your personal data and other personally non-identifiable information collected through our Services to help us improve content and functionality, to better understand our users, and to improve our Services. We may use this information to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each marketing communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. In addition, if at any time you wish not to receive any future marketing communications or wish to have your name deleted from our mailing lists, please contact us as indicated below.

If we plan to use your personal data in any manner that is not consistent with this Privacy Policy, you will be informed prior to or at the time when your personal data is collected.

### **When We Share the Information We Collect**

We are committed to protecting your personal data. We consider this to be a vital part of our relationship with you. We commit that if we share your data, it will be only in the following circumstances.

- **At Your Request.** We may share your data where you have consented or otherwise given us permission to share your data. For example:

- if you want us to retrieve your credit report on your behalf, we will need to share your personal data with third party credit bureaus for the purpose of retrieving your credit report.
- If you choose to open an Origin Deposit Account to handle your savings goals, we will need to share your personal information with our banking partner BBVA.

In general, we will not share your name, address, email address, phone number, or tax identification number (such as U.S. social security number) with third party product providers that we refer you to. When you decide to pursue an offer from a referred third-party product provider, you may be asked

to provide information directly to that provider, including your personal data. Using our Services does not require you to provide any information directly to such providers, unless you wish to. If certain referred third party service providers want us to share your personal information with them, for example for simplifying their sign up process, we would seek your explicit prior consent before doing so.

- **As Aggregated or De-Identified Information.** Although we will not share your name, address, email address, phone number, or tax identification number (such as U.S. social security number) without your consent or unless you opt in to such sharing, we may share information that is aggregated or de-identified, so that it cannot reasonably be used to identify you. For example, we may include certain financial information about you (e.g., your rate of return for a security, token or currency) in a leaderboard that is accessible publicly, but your personal data will not be associated with such information unless you consent or opt-in to having your personal data associated or otherwise claim the profile associated with such information. In addition, we may share aggregated or de-identified information with third party providers to permit them to make offers that are more relevant to you.

- **With Third Parties Needed to Provide Our Services.** We may share your information with vendors and partner service providers whom we use in delivering our Service. Examples include:
  - vendors who provide us with technology services such as hosting, identity verification, support, payment, bank account verification or email service. We provide these vendors with only the information they need to perform their specific function.
  - Our bank partner BBVA which supports the Origin Deposit Accounts

- **For Legal Reasons.** We may share your information if required by applicable law or legal process, or if we believe it is in accordance with applicable law or legal process. This can include protecting the rights, property, and safety of Origin and its users, and the public, including, for example, in connection with court proceedings, or to detect or prevent criminal activity, fraud, material misrepresentation, or to establish our rights or defend against legal claims.

- **As Part of a Corporate Change.** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, or similar event, your personal data may be part of the transferred assets

### **How to Update or Delete Your Account Information**

You agree to promptly update your account information in the event of any change. If you need to update your personal data, please contact us at [support@useorigin.com](mailto:support@useorigin.com). We will take reasonable steps to update or correct your personal data in our possession that you have previously submitted through our Services. You can also update your own data in our mobile app using the edit feature.

You may also choose not to provide us with your personal information, but you may as a result not be able to use some of our Services. You may terminate your account with us at any time by submitting a request to [support@useorigin.com](mailto:support@useorigin.com), although additional steps may be required to close your Origin Deposit Account. Please note that we may retain your personal data and other information beyond the end of your relationship with us in accordance with our internal record-

keeping policies and with applicable law, including to comply with legal reporting obligations.

### **When You Provide To Us Unsolicited Information**

This Privacy Policy does not apply to any unsolicited information you provide to us. This includes, but is not limited to, information posted to any public areas of our website, such as forums, any ideas for new products or modifications to existing products, and other unsolicited submissions. If you make an unsolicited submission, we will not treat this as confidential and we can reproduce, use, disclose, and distribute this information to others without limitation or attribution. For the safety and security of your information, please do not submit information to us other than when we specifically ask you for it.

### **When Our Services Are Unknowingly Accessed by Children**

We do not knowingly collect personal data from children under the age of 13. If you are under the age of 13, please do not submit personal data to us. If you have reason to believe that a child under the age of 13 has provided personal data to us, please contact us and we will endeavor to delete that information from our databases, subject to applicable law.

### **When You Link to Other Websites or Services**

This Privacy Policy applies only to our website and our Services. Our website or Services may contain links to other websites or services not operated or controlled by us, including websites and services operated by the third-party product providers who may make offers available to you through our Services. The policies and procedures we describe in this Privacy Policy do not apply to the websites of these third parties. The links from the Services do not imply that we endorse or have reviewed these third parties' websites or their respective privacy policies. We suggest contacting such websites directly for information on their privacy policies.

### **Our Security Practices**

We take reasonable steps to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. These include policies designed to protect the confidentiality and security of your personal data such as industry-standard encryption and authentication measures. We also limit access to your personal data to employees and service providers that have a business reason to know such information. However, no Internet or email transmission is ever fully secure or error free.

### **Our Terms of Service**

Your access to and use of our services is also subject to our Terms of Service which may be found at [useorigin.com/terms](http://useorigin.com/terms)

### **Changes to The Origin Privacy Policy**

Our business and Services may change from time to time. As a result, at times it may be necessary to make changes to the Origin Privacy Policy. If we make changes, we will notify you by revising the "Last Updated" date at the top of this page. If we make material changes, we will do so in accordance with applicable legal requirements, and we will post a notice on our website and mobile applications alerting our users to the material changes prior to such changes becoming effective. Your continued use of our Services after any changes or revisions to the Origin Privacy Policy will

indicate your agreement with the terms of such revised Privacy Policy.

## PRIVACY NOTICE FORM

### FACTS

#### What Does Origin Do with Your Personal Information?

##### ***Why?***

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

##### ***What?***

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Date of Birth and address
- Account balances and payment history
- Credit history and credit scores

When you are no longer our customer, we continue to share your information as described in this notice.

##### ***How?***

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Origin chooses to share; and whether you can limit this sharing.

#### Reasons we can share your personal information

***For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus:***

Do we share? Yes

Can you limit this sharing? No

***For our marketing purposes to offer our products and services to you***

Do we share? Yes

Can you limit this sharing? No

***For joint marketing with other financial companies***

Do we share? With your consent only  
Can you limit this sharing? Yes, by not giving consent

***For our affiliates' everyday business purposes information about your transactions and experiences***

Do we share? Not applicable  
Can you limit this sharing? Not applicable

***For our affiliates' everyday business purposes information about your creditworthiness***

Do we share? Not applicable  
Can you limit this sharing? Not applicable

***For our affiliates to market to you***

Do we share? Not applicable  
Can you limit this sharing? Not applicable

***For nonaffiliates to market to you***

Do we share? No  
Can you limit this sharing? We don't share

**Questions**

Email us at [help@useorigin.com](mailto:help@useorigin.com) or go to [www.useorigin.com](http://www.useorigin.com)

**Who we are**

***Who is providing this notice?***

Blend Financial Inc. doing business as Origin ("Origin")

**What we do**

***How does Origin protect my personal information?***

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

***How does Origin collect my personal information?***

We collect your personal information, for example, when you:

- Link an external bank account

- Open an Origin Deposit Account
- Complete your financial diagnostics

We also collect your personal information from others, such as your employer, you existing bank if you link to your bank account.

### ***Why can't I limit all sharing?***

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

### ***What happens when I limit sharing for an account I hold jointly with someone else?***

Your choices will apply only to you unless you tell us otherwise.

## **Definitions**

***Affiliates:*** Companies related by common ownership or control with Origin. *Origin does not have any affiliates.*

***Nonaffiliates:*** Companies not related by common ownership or control. They can be financial and nonfinancial companies. *Origin does not share with nonaffiliates so they can market to you.*

***Joint marketing:*** A formal agreement between nonaffiliated financial companies that together market financial products or services to you. *Our joint marketing partners include financial service companies.*

## **Other important information**

We may offer financial services through joint marketing with other unaffiliated companies; if such joint marketing requires, or benefits from, sharing personal information, we will ask for your explicit consent to share such information.

We may also share aggregated or de-identified Information, which cannot reasonably be used to identify you.