



M1's Privacy Policy

This Privacy Policy ("Policy") covers the following affiliated companies in the M1 family of companies: M1 Holdings Inc., M1 Finance LLC, M1 Advisory Services LLC, and M1 Spend LLC. These entities are collectively referred to as "M1," "affiliated companies," "we," "us," and "our" throughout this Policy.

Overview

We are committed to maintaining the privacy and confidentiality of our customers' personal information. In the course of offering and providing financial products and services, we collect and maintain certain personal information about you. This information can come from information you provide on applications or other forms, through your inquiries by mail, e-mail, or telephone, or by other means.

This policy explains what personal information we collect and how we use and share such personal information. It also explains what you can do to limit the use and sharing of your personal information. We do not disclose personal information about our customers to non-affiliated third parties, except as described below.

Online Privacy

M1 Finance may periodically collect information from you through automated means. When you browse our site, use the iOS and Android applications, use our services, or read our emails or newsletters, we may use "cookies" or other online tracking mechanisms (including pixel tags, web beacons, clear GIFs and device fingerprints) in order to provide better service, facilitate your use of the site or services, store online preferences, track usage of the site or services, tailor the marking of business services, or enhance security. M1 does not store login credentials used to link Account information.

Some of our cookies are used for web analytics and intelligence about our site. We may also use web beacons or other technologies for similar purposes and we may include these in marketing email messages or our newsletters in order to determine whether messages have been opened and links clicked on. Web beacons do not place information on your device but may work in conjunction with cookies to monitor online activity.

By using our site or applications you agree that we can place cookies on your device and use other online tracking mechanisms as explained in this privacy notice. You may be able to control your acceptance of cookies and similar technologies on a website, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. If you do not accept cookies, you may experience some inconvenience in your use of some sites and online products. For example, a website may

not be able to recognize your device and you may need to answer challenge questions or provide additional information each time you log on.

To help us protect against fraud, provide our services to you, and improve our services, we collect location data, including current and historical information concerning a user's geographic location, GPS location, transaction location, and IP addresses that are used in conjunction with our services. We collect your precise location data with your permission, and use that information, for example, to help protect against fraud by detecting and declining debit card transactions that may occur far away from your device's location. You may decline to allow us to collect such geolocation information, in which case M1 may not be able to provide certain features or functionalities to you.

We also may obtain information on the device you use, including the Universally Unique Identifier, advertising identifier ("IDFA" or "AdID"), operating system and version, wireless carrier, and network type. This information is used to identify customer device issues and for marketing purposes.

If you subscribe to any of our newsletters, we will use your name and email address to send the newsletter to you. You can unsubscribe at any time following the instructions at the bottom of these emails or you can contact us at the information below. We also may collect information from you derived or resulting from voluntary surveys.

By providing your phone number you expressly consent to M1 and/or its agents calling or texting you using an automated telephone dialing system and/or prerecorded messages, even if you incur charges for receiving such communications. You may request to be removed from phone or text communications by emailing privacy@m1finance.com or informing the agent that contacts you.

We may access your contact list, with your permission, on your mobile device or in your email accounts so that you can identify your contacts using our services and direct the invitation of your contacts for our services. We store and use this information to suggest referrals or connections and for other reasons related to our services.

Interest-based Advertising

We use "interest-based" ads, which are known as "online behavioral advertising." We may partner with ad networks and other advertising providers ("Advertising Providers") who serve ads on behalf of us and others on non-affiliated sites. Some of these third parties may use cookies and other technologies to collect information about your online activities over time and across third party websites or online services to deliver advertising based on your interests and preferences, as inferred from your browsing history. Some of these ads may be personalized,

meaning that they are intended to be relevant to you based on information that M1 and its Advertising Providers collect about your visits to this site and elsewhere over time.

We may use third-party analytics services (for example, we use Google Analytics, Facebook, and others) to evaluate your use of the platform, compile reports on activity, analyze performance metrics, and collect and evaluate other information relating to the platform and mobile and internet usage. For more information on these third parties, including how to opt out of certain data collection, please visit www.google.com/analytics. Please be advised that if you opt out of any of these services, you may not be able to use the full functionality of the platform. Additionally, all browsing information is collected in the aggregate, de-identified and anonymized.

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. At this time, we do not recognize or respond to DNT signals.

Protecting Information

With regard to our internal security procedures, we restrict access to your personal and account information to those employees who “need to know” the information in order to provide products and services to you. We maintain reasonable physical, administrative, and technical safeguards to protect your personal information. We conduct regular internal audits of our business practices and procedures in order to protect your personal information.

We may also disclose your personal information as required by law, such as to comply with a subpoena, or similar legal process and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

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](#).

If you choose to apply for an M1 Visa™ debit card, you understand that such card is issued by Lincoln Savings Bank and you agree to comply with [Lincoln Savings Bank’s privacy policy](#).

If you choose to apply for The Owner’s Reward Credit Card by M1, you understand that such card is powered by Deserve and issued by Celtic Bank, and you also agree to comply with [Deserve’s privacy policy](#) and [Celtic Bank’s privacy policy](#).

If you choose to use M1 Instant Help chatbot, you understand the chatbot is provided by M1 in partnership with Ada Support Inc. and you agree to comply with [Ada Support Inc.'s privacy policy](#).

Retention of Your Information

We will retain your personal information for as long as it serves the purposes(s) for which it was initially collected as stated in this Privacy Policy, or subsequently authorized. We will also retain and use personal information as necessary to comply with our legal obligations, resolve disputes, or enforce our agreements. If you are no longer a customer, we will not destroy your information unless required or permitted by law. We will continue to treat your personal information in accordance with this privacy policy and applicable laws.

Information connected to you that is no longer necessary and relevant to provide our services may be aggregated with other non-personal data to provide insights which are commercially valuable to M1, such as statistics of the use of M1 Services.

Children's Privacy

We do not knowingly collect or solicit any information from anyone under the age of 18 on our services. In the event that we learn that we have inadvertently collected personal information from a child under age 18, we will take reasonable steps to delete this information. If you believe that we might have any information from a child under 18, please contact us at privacy@m1finance.com.

California Privacy Rights

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use and share your "personal information" (as defined in the California Consumer Privacy Act ("CCPA")), other than the personal information we collect in connection with providing financial products and services. *The CCPA, however, does not apply to all M1 entities.*

Depending on how you interact with our website and services, we may collect the following categories of personal information about you, in addition to the information we collect in connection with providing financial products and services:

- Identifiers, such as your name and contact information, IP address, and mobile device identifiers
- Internet usage information, such as browsing history, access history, and use and interaction with our website.

This information is used and disclosed for the purposes and to the categories of third parties described in the main privacy policy, above.

Your California Privacy Rights

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or distributing your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we may have about you.

We do not sell Personal Information to third parties. We do allow third parties to collect personal information through our service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our service and elsewhere based on users' online activities over time and across different sites, services, and devices.

California law permits consumers to request, once per year, that we disclose the identity of any third parties with whom we have shared personal information for the third parties' direct marketing purposes within the previous calendar year, along with the type of personal information disclosed. Please contact privacy@m1finance.com for such requests.

Updates to This Policy

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time. If we do change it, we will revise the "Effective Date" above and post the new policy. To stay informed of our privacy practices, we recommend you review this Policy on a regular basis as you continue to use our Services.

Contact Us

For questions about our policy, or for additional copies of this notice, please email us at privacy@m1compliance.com.

Facts	What does M1 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 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security Number and income • Account balances and transaction history • Investment experience and checking account information <p>When you are <i>no longer</i> our customers, we continue to share your information as described in this notice.</p>
How?	<p>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 reason M1 chooses to share; and whether you can limit this sharing.</p>

Reasons we can share your personal information	Does M1 share?	Can you limit this sharing?
<i>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</i>	YES	NO
<i>For our marketing purposes – To offer our products and services to you</i>	YES	NO
<i>For joint marketing with other financial companies</i>	NO	We Don't Share
<i>For our affiliates everyday business purposes – information about your transactions and experiences</i>	YES	NO
<i>For our affiliates' everyday business purposes – information about your creditworthiness</i>	NO	We Don't Share
<i>For our affiliates to market to you</i>	YES	YES
<i>For nonaffiliates to market to you</i>	NO	We Don't Share

To Limit Our Sharing	<p>Email us at privacy@m1finance.com.</p> <p>Please note:</p>
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	<p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Email us at privacy@m1finance.com .

Who we are	
Who is providing this notice?	M1 Holdings Inc. (also “M1”) and its affiliates. See list of affiliates below.

What we do	
How does M1 collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account or give us your income information, • Seek information about your investment or retirement portfolio, • Make deposits or withdrawals from your account. <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
How does M1 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.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under certain state laws.</p>

What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
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Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Our affiliates include companies with a M1 name; financial companies such as M1 Finance LLC and M1 Advisory Services LLC; nonfinancial companies such as M1 Holdings Inc. and M1 Spend LLC.</i></p>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>M1 does not share with nonaffiliates so they can market to you.</i></p>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>M1 doesn't jointly market.</i></p>

Other Important Information
<p>State and International Laws</p> <p>For Vermont Residents: In accordance with Vermont Laws, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates without your consent.</p> <p>For Nevada Residents: Nevada law requires us to disclose that you may request to be placed on M1's internal "do not call" list at any time by calling (312) 600-2883, and that we are providing this notice to you pursuant to state law, and that you may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone 702-486-3132; email BCPINFO@ag.state.nv.us.</p>

For California Residents: In accordance with California law, we will not share information we collect about you with nonaffiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.