

#### Updated August 20, 2025

# Privacy Policy

This Privacy Policy is to inform you of how Nyble USA Inc. ("Nyble," "we," "us,", "our", or "Company") on the policies and procedures on the collection, use and disclosure of your information when you use the Services (as defined in our Terms and Conditions) we provide. This Privacy Policy applies to information we collect from you and from third parties, both online and offline ("Personal Information"). We use your Personal Information to provide and improve the Services. The Privacy Policy concerns how we collect, use, and disclose your Personal Information when you visit our Website, including but not limited to other sites, sub-domains, portals, and digital applications owned and operated by Nyble (the "Website"). If you create an account with us, our Gramm-Leach-Bliley Consumer Privacy Notice applies to you. Please review our Gramm-Leach-Bliley Consumer Privacy Notice at the end of this document.

By using the Services, you agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with any term in this Privacy Policy, please do not provide us with your personal information or use our App, Website, or Services.

#### Information You Provide Us

Nyble collects and uses personal information for the purposes of providing our Services. We collect personal information directly from you through your use of our platform, the application you submit, and through our interactions with you.

Personal Information: We use your personal information to determine your eligibility for products and our Services. We may also request your government-issued identification to confirm your identity. This information may include the following information: name, address, date of birth, phone number, email address, social security number, information about your rent or mortgage payments, credit-related information, financial transaction history, and credentials for third-party services.

Financial Information: For some of our Services, we collect your bank account, and other financial information. Your credentials are maintained by the third-party service provider and Nyble does not store your bank account login information. We use your bank account



information to verify your identity, determine your eligibility for Services, and collect information for payments.

Payment-Related Information: We may collect payment-related information including bank account numbers and payment card numbers that you enter and give us when you use our Services.

Communications: when you communicate with us, we may monitor and record our chat or telephone conversations to check your instructions to us, and assess and improve our services for training and quality assurance services and for the purposes of investigating any complaints you may make.

Marketing: We may obtain your consent to send you marketing communications by mail or email that promote products and services offered either by us or by third-party partners. You can opt out of receiving these offers by clicking the unsubscribe link in our marketing email communications or by contacting us.

#### Information Obtained from Third Parties

We may obtain information from third parties including but not limited to identity verification services, third-party websites, third-party apps, merchants, and others. If you are applying for our Services through a third party, the third-party partner may also share your personal information with us in order to provide our services to you.

Credit score and reports: If you register for an account on Nyble's Website, Nyble will obtain and provide you with your credit score from a consumer reporting agency. Nyble will provide your credit score to you at the time of account creation and on a regular basis thereafter as long as you have an account with Nyble. Nyble may periodically use this information to attempt to pre-qualify or pre-select you for offers from third-party partners.

#### **Disclosures and Transfers of Personal Information**

We may disclose Personal Information that we collect or you provide as described in this privacy policy to:

Financial Institutions: We may transfer your personal information to financial institutions for payment and identity verification purposes.



Credit Bureaus: Each time you use Nyble to access your credit report, Nyble will share your information with Credit Reporting Agencies., including your name, address, and date of birth. This information will be used by Credit Reporting Agencies to confirm your identity and obtain information from your credit file with Credit Reporting Agencies. If you are eligible for Nyble's Credit Reporting Services, Nyble may also transfer your Personal Information and payment information, including on-time and missed payments, to Credit Reporting Agencies, if available, for inclusion on your credit report as a new tradeline.

Service Providers: We may also transfer your personal information to our Service Providers used to administer or provide products, services, or information on our behalf such as to operate and host our websites and features, and to send marketing communications. We require the organizations that we use to limit the use of your personal information only to the extent of the services that we have contracted them to provide.

Third Parties: If you use Nyble's Services, we may share certain Personal Information we have about you with third-party partners to market their products or services to you if you have consented to/not opted out of these disclosures.

Legal & Compliance: To meet regulatory, legal, industry self-regulatory, and security requirements or other purposes identified with your consent or as required by law.

#### **Our Website**

Personal information that we collect about you when you use our website is what you tell us about yourself, for example, by completing an online application, or information you provide to us through the "Contact Us" section or when you send us an email. As most websites do, we track usage patterns on our website on an anonymous basis. Your identity cannot reasonably be ascertained from this information. Each time you visit our website, our server records your internet service provider, the timestamp of your visit, the pages you visit, the documents downloaded, the searches you performed, and the referring URLs you came from. We use this non-personal information to optimize our website service. For your convenience, we may offer links from our website to other websites. However, we are not responsible for, nor do we accept any liability for, the personal information collection, use, and disclosure practices of other entities to which our website may link. You should consult the privacy policies of these other entities before providing any personal information on their websites.



#### Access, Accuracy, and Corrections

We maintain a file of your personal information for the above-mentioned purposes. If you wish to request access to, or correction of, your personal information in custody or control, please make your request in writing to us. We may need to verify your identity before searching for or providing you with personal information. In some circumstances, we may not provide access to your personal information, for example, if it contains the personal information of other persons, if it constitutes confidential commercial information, or if it is otherwise not properly the subject of an access request. It is important that your personal information be accurate and up to date. Please inform us as soon as possible of any changes to your personal information. If you have any questions, requests, or complaints about our personal information practices, please contact us.

#### Consent

We collect, use, and disclose your personal information with your consent or as permitted or required by law. Your consent may be expressed or implied, depending on the circumstances and the sensitivity of the personal information in question. For example, in most cases, a client's consent to the collection, use, and disclosure of personal information by us may be implied by the fact that the client has engaged us to provide services, where the collection, use, and disclosure of personal information relates to the performance of those services by us. If you provide personal information about another person to us, we assume you have the consent of that individual to enable us to collect, use, or disclose their information as described in this Privacy Policy. If you choose to provide personal information to us, we assume that you consent to the collection, use, and disclosure of your personal information as outlined in this Privacy Policy. If you do not consent, please do not provide your personal information or, where applicable, exercise the opt-in or opt-out options offered. Subject to legal and contractual requirements and reasonable notice, you may refuse to consent to our collection, use, and disclosure of your personal information, or you may withdraw your consent to our further collection, use, and disclosure of information about you, by contacting us via email. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our services. There are instances where we may collect, use, or disclose your personal information without your consent, for example, to collect a debt you owe to us, to comply with a subpoena or court order, or to comply with the rules of court regarding the production of records.



## **Changes to Our Privacy Policy**

We update our Privacy Policy regularly and we reserve the right to change this Privacy Policy at any time without notice to you. We will take reasonable steps to advise affected individuals of any material changes. You may contact us to obtain a current copy of this Privacy Policy.

#### Contact Us

If you wish to make inquiries, access/update the information that we have about you, or obtain further information. Please contact us at privacy@nyble.com.

# **FACTS**

# WHAT DOES NYBLE USA INC. 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
- Account balances and payment history
- Account transactions and history
- Credit history and credit scores
- Employment information and income

## 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 Nyble USA Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Nyble USA Inc. share?	Can you limit this sharing?
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	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

# To limit our sharing

Email us at <a href="mailto:privacy@nyble.com">privacy@nyble.com</a>

If you are a *new* customer, we can begin sharing your information 45 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

# **Questions?**

Email us at <a href="mailto:privacy@nyble.com">privacy@nyble.com</a>

Who we are	Who we are		
Who is providing this notice?	Nyble USA Inc.		
What we do			
How does Nyble USA Inc. 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 Nyble USA Inc. collect my	We collect your personal information, for example, when you		
personal information?	Open an account or provide account information		
	■ Give us your contact information		
	■ When you use Nyble USA Inc.'s Services		
	We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.		
Why can't I limit all sharing?	Federal law gives you the right to limit only  sharing for affiliates' everyday business purposes—		
	<ul> <li>information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> </ul>		
	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 to everyone on your account.		
Definitions			
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  Companies with Nyble names, such as Nyble Global Inc.		
	■ Fincentify Inc.		
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  Non affiliates we share can include (i) other financial services providers (such as banks and other financial institutions); and (ii) nonfinancial service providers, including hosting platforms, vendors that support KYC/AML and fraud prevention, sanctions screening providers, data processing firms, marketing partners, and API integration providers.  Plaid: In order to provide you with our Services, the Company utilizes an application programming interface ("API") offered by Plaid Technologies, Inc. ("Plaid"). This service enables the secure collection of your information from financial institutions. By accessing or using the Website and/or Services, you acknowledge and agree to Plaid's Privacy Policy, available at https://plaid.com/legal, and consent to your information being handled in accordance with that policy.		
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  Our joint marketing partners include financial institutions with whom we have joint marketing agreements and companies that provide marketing on our behalf.		

# Other important information

California Residents: We will not share your information with companies outside of Nyble USA Inc. or any of its affiliates, except for our everyday business purposes, for marketing our products and services to you, or with your consent.

Vermont Residents: We will not share your information with companies outside of Nyble USA Inc. or any of its affiliates, except for our everyday business purposes, for marketing our products and services to you, or with your

consent. Notwithstanding the foregoing, we will not disclose credit information about you to Nyble USA Inc. affiliates (or to unaffiliated parties) except as required or permitted by law.

Nevada Residents: We are providing this notice to you pursuant to Nevada law. You may be placed on our internal Do Not Contact List by following the instructions under the "To limit our sharing" section above. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protections, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101, phone number (702) 486-3132, email BCPINFO@ag.state.nv.us.