

# Denizen Mobile App Privacy Policy

Last Updated: *August 2018*

In this Privacy Policy We regulate the processing of the “Personal Information” provided by You through the mobile application named “Denizen” (“App”) owned by Banco Bilbao Vizcaya Argentaria, S.A. (“BBVA”) and licensed to Denizen Financial Inc. (“Denizen Inc.”).

“You” and “Your” means you as the user of our App. “We”, “Us” or “Our” means BBVA (if you are an EU user) and Denizen Inc. (if you are a US user).

You can read the information related to BBVA and Denizen Inc. in Our [Legal Notice](#).

All the words or group of words in this policy whose first letter is a capital letter will have the meaning that has been given to them in the [User Agreement for Denizen Service](#), unless a specific different meaning has been provided here.

## **Content and Acceptance**

This privacy policy ("Privacy Policy") is intended to inform You how We gather, process and protect Your Personal Information, collected throughout this App for you to decide freely and voluntarily whether You want to provide Us such Personal Information.

This Privacy Policy is a part of the Terms and Conditions that regulates the use of the App. The acceptance of this Privacy Policy implies Your full acceptance of its content. In this regard, You agree to comply with the provisions indicated in this Privacy Policy. This policy may be amended from time to time. Any updates to the Privacy Policy become effective when we post the updates on the App. Your use of the App following an update to this Privacy Policy means that You accept the updated Privacy Policy.

This Privacy Policy applies to the Personal Information collected in this App by BBVA or Denizen Inc., as data controllers and is not applicable to further information gathered by third parties in connection with the App or in other apps or websites, even if such apps or websites are linked in this App.

## **Who is responsible for the processing of Your Personal Information**

We inform You that the Personal Information collected throughout any Personal Information collection forms contained in this App, Your browsing through the App; will be included in a Personal Information filing system owned by BBVA (if you are an EU user), with registered office in Plaza San Nicolas 4, 48005 Bilbao (Vizcaya) (Spain) and by Denizen Inc. (if you are a U.S. user), with registered offices in 1209 Orange Street, Corporation Trust Center, New Castle County, Wilmington, Delaware 19801, USA and will be used to manage Your access to the App, Your onboarding, Your browsing of the App in its case, as well as for the purposes specified in each of the Personal Information collection forms included in the App.

We maintain the confidentiality of Your Personal Information and We also maintain compliance with all the applicable laws and legislations pertaining to such Personal Information.

So that the information provided by You is always updated and contains no errors, You must notify Us of any changes and/or corrections of Your Personal Information as soon as they occur.

When clicking on "Send", or equivalent button, on the aforementioned data collection forms, You declare that the Personal information provided is accurate and truthful.

### **Disclosure of Personal Information**

We won't share Your Personal Information with other third party organizations without obtaining Your prior consent, unless the transfer is necessary for maintaining Our relation with You, in such case You will be informed before such information is shared.

In any case, when the data transfer is not necessary for the proper provision of the relevant service, in the Personal Information collection forms We will inform You of the purpose of processing and the identity and activity sectors of the potential transferees of Your Personal Information so that you may permit or refuse the transfer depending on its purpose.

### **Denizen Onboarding**

BBVA, Denizen Inc., the Partner Banks, Plaid, Salt Edge and Yodlee need to process the Personal Information You provide during the onboarding in order to identify You within the registration process at Denizen, to hire Denizen Services as well as the services provided by third parties through Denizen. You will be requested to provide an identification document (with a picture) and a video recording that You will have to make at that moment, with the purpose of verifying your Identity by comparing the picture in your identification document with your image in the video, as well as to verify the authenticity of your identification document.

By accepting this privacy policy and recording the video, You will be giving your consent to the processing, recording, playback and storage of your personal data related to your image, voice and conversation, recorded in the video made during the registration process, with the only purpose of verifying your identity and as evidence.

If there is a problem identifying you within the onboarding process, You agree that Denizen will be able to contact you by phone or by email for the purpose of correcting such error and finalizing your registration. If your onboarding is declined, all the data collected will not be stored but destroyed, except for data we are required to retain by applicable law and regulation.

When hiring the services provided by third parties through Denizen, please note that:

- Said third party service providers will be responsible for your Personal Information with regard to the hiring of the services that You have requested through Denizen.
- Before hiring any service with a third party, we recommend that You read carefully the privacy policy of the third parties. If you want to see the privacy policy of the third parties, click [here](#).

### **Commercial communications**

You are hereby informed that We could obtain Your consent with the purpose of sending You commercial communications through each data collection form. Where You have expressly consented, by filling in the opt-in box that may appear in the data collection form, We may contact You by email, post, sms, or through any other equivalent electronic communication mean, with information about Denizen services.

In any case, you are not required to receive such advertising and information, and You may refuse to do so either by not filling in the opt-in box or by sending a subsequent communication. If at any time You no longer wish to receive these types of communications, You may revoke Your consent by sending the appropriate notification to the following email: [support@denizen.io](mailto:support@denizen.io) along with a copy of a document that verifies Your identity, or using the link provided for this purpose in the commercial communications received.

### **Does the App collect precise geolocation information of the device?**

You have to take into account that the onboarding and the proper functionality of our App require your geolocation data as we detail below, so it is a requirement to register and use the App that you opt to use the location based services. You will be informed of the necessity to activate the location based services during the onboarding process and You will have to accept its activation to go on with the process and be able to use the App.

The App collects precise information about the location of your device. Location information is obtained from technologies like GPS, Wi-Fi, or cell tower proximity. We do not control your location information preferences from within the App.

We use Your location information to provide requested location-based services for finding ATMs nearest to you and displaying them on a map in relation to your location, and also for mandatory fraud prevention, onboarding decision making and to make decisions on what functionalities we would allow you to do, such as depositing checks or activating your Denizen Card. Please note that once You have turned on the location-based services, they will be kept activated and You will be only able to disable it through Your device setting, in which case the Denizen service will not be able to be provided to You.

### **Contacts agenda**

This functionality will allow you to access and select from your contacts agenda in your device the phone number or email of your contact to whom you want to make a Denizen Instant Transfer. To do it, we will request your consent to access to your contacts and you will agree that we will be allowed to access to your contacts agenda to operate the functionality described. We will not use your contacts agenda's information for other purposes other than those specified above.

### **Cookies**

Our App uses the technology called "cookies" to collect information about how our App is used. For more information please click [here](#).

How does the Mobile Application respond to Do Not Track signals?

Do Not Track ("DNT") is a privacy preference that users can set in recent versions of most major web browsers, including Firefox 5+, Internet Explorer 9+, Safari 5.1+, and Chrome. DNT allows users to inform web services that they do not want certain information about their webpage visits collected across websites/apps.

In accordance with this Privacy Policy, we and our service providers and/or third party analytics companies may collect (provided you consent) certain personally identifiable information ("PII") about your online activities over time and across third party websites or online services. Such information might be collected for improving the user experience in the App, marketing purposes, including the delivery of ads that are tailored to you based on your visits to other websites. We may also use such information for our internal product development or research purposes. While our App does not respond to DNT signals, you may be able to set your app to block location services and collection of certain information as described above.

### **Third party sites**

Our App may contain links to sites controlled by third parties. Please bear in mind that We are not responsible for the privacy and personal Information processing by other apps and/or websites. This document only applies to the information collected exclusively in this App by Us. We recommend that You read the privacy and personal information processing policies of other apps and/or websites that You may visit using the link in Our App or in any other manner.

### **Confidentiality**

The Personal Information that We may collect through the App or through individual communications that We maintain with You will be processed with absolute confidentiality. We are committed to maintain the confidentiality of such information ensuring that it will be stored implementing all the necessary security measures to prevent changes, loss and unauthorized processing or access, in accordance with the applicable legislation.

### **Security**

We have implemented and maintain the standards of security as are required by law to protect Your Personal Information from accidental loss and from unauthorized access, use, or disclosure of any information. You can access the Security Policy [here](#).

### **Data Retention**

Our operational systems will store user-provided data for as long as you use the related feature of the App, unless you choose to delete it or as required by applicable law. Please note that some or all of the user-provided data may be required in order for the App to function properly, and we may be required to retain certain information by law. If you close your profile established for the App, please note that in order to comply with the law and supervisory requirements, we need to store user provided data for the time required by law.

### **Children**

We do not use the App to knowingly collect data from or market to children under the age of 13. If a child under 13 has provided us with personal information without parental or guardian consent, the parent or guardian may contact us at [support@denizen.io](mailto:support@denizen.io). We will delete such information from our files within a reasonable time and unsubscribe the child from any promotional contact opportunities.

### **Privacy policy Updates and Effective Date**

We reserve the right to modify this privacy policy at any time. If we make updates to this policy, We will inform You regarding the updated privacy policy. Please review the "Effective Date" posted at the top of this privacy policy. Your use of the Site following an update to this privacy policy means that you accept the updated policy. You may also visit <http://www.denizen.io> to view the current copy of this policy.

### **Exercise of rights**

We inform You that You may exercise for free at any time Your rights of access, rectification, cancellation and objection to the processing of Your personal data by sending a written notice, attaching a photocopy of a document evidencing Your identity, to the following address: [support@denizen.io](mailto:support@denizen.io).

You may revoke the consent given for the use of Your Personal Information as provided for in this Privacy Policy, by sending a notice to [support@denizen.io](mailto:support@denizen.io).

If You have any questions related to this Privacy Policy You may contact Us at [support@denizen.io](mailto:support@denizen.io).

### **The EU-U.S. Privacy Shield**

Denizen Inc. complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Denizen Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.