

Privacy Policy	
About this Privacy Policy	If you are at least 18 years of age, this Privacy Policy applies to your use of our apps, websites and other services from the U.S. and describes how we collect, use, and share personal information in that context. This Privacy Policy does not apply to your use of our financial products and services as a customer and user of the Bella app, which are covered by our separate Privacy Notice [link] .
Personal Information We Collect through the Services	When you use our services, we collect certain categories of personal information that you directly provide to us, that we collect through cookies and similar automated methods, and from other sources, like social media or your interactions with our concierge.
How We Use the Personal Information We Collect	We use the personal information we collect for our business purposes, which include things like responding to and fulfilling your requests; establishing and managing our customer relations; analyzing, providing and improving our products and services; communicating with you and sending you information and advertisements regarding products and services we believe may interest you; and as otherwise described below.
How We Share the Personal Information We Collect	We share your personal information to facilitate the purposes described in the “How We Use the Personal Information We Collect” section of this Privacy Policy, including sharing automatically-collected information with advertising partners and analytics providers who help us serve ads; however, we try to provide you with choices about how we will share your personal information.
Your Privacy Choices	We respect your personal privacy and offer you a number of options to confirm your information, learn about and change your communications and advertising preferences, and submit related inquiries.
Your California Privacy Rights	If you are a California resident, you have certain rights related to the collection, use, and disclosure of your personal information and may make requests related to those rights. We work hard to honor your requests and comply with the law.
How We Secure and Store Your Personal Information	The security of your information is very important to us. We have robust safeguards in place to secure your personal information and work hard to provide you with a safe and secure online experience.
Children’s Privacy	Our site is intended for use by adults, and we do not knowingly collect the personal information of children under the age of 13.
Contact Us	If you have any questions about our privacy practices or want to make a request related to your personal information, we offer a number of ways to reach out to us.

Bella App Privacy Policy

Effective Date: 8/31/20

Meet Bella

Bella is a unique, online personal banking experience that delivers checking, savings, debit card, and payment functionality and brokerage services through an easy-to-use conversational interface. The conversational experience is powered by an automation engine that understands your requests and instantly presents you with the information and resources needed to complete your banking and brokerage transactions while delivering a superior, personalized customer service experience that other banks don't offer online. When you use Bella, we will tell you when you are speaking with a live person or not. You can read more about Bella here <https://www.bellaloves.me/>.

About this Privacy Policy

This Bella App Privacy Policy ("Privacy Policy") includes information about how we collect, use, and share personal information.

Application

This Privacy Policy applies when you visit or use our applications, websites and related services ("Services"). It describes how we collect, use and share information when we provide the Services and explains your related rights and choices. The terms "Bella," "we," "us," or "our" mean Bella Loves Me LLC, its subsidiaries, parents, and affiliates. "You" and "your" refer to individuals who visit our Services and are at least 18 years of age.

What this policy does not cover

- ***Financial products and services.*** This Privacy Policy does not cover information collected about individuals who seek, apply for, or obtain our financial products and services for personal, family, or household purposes. Your application for and use of the Bella app and the financial products and services in the app are covered by our separate **Privacy Notice** [\[link\]](#), which details the collection, use, and sharing of personal information in connection with financial products and services.
- ***Other entities.*** This Privacy Policy does not apply to the websites, mobile applications or other online or offline services of other LivePerson, Inc. brands whose websites and applications do not link to this Privacy Policy. It also does not apply to non-affiliated companies, partners, or third parties whom we may reference in the app. Please review the privacy policies of the other websites, apps, and services you visit to understand their privacy practices.
- ***Non-U.S. users.*** At this time, the Bella Services are intended for a U.S. audience only.

Changes to the Bella App Privacy Policy

We will update this Privacy Policy from time to time, so please review it regularly. If we materially alter this Privacy Policy, we will update the “Effective Date” at the top of this page and inform you by posting a notice in the app or by otherwise notifying you. Your continued use of our Services will be deemed your agreement that your personal information may be used in accordance with the new Privacy Policy.

Personal Information We Collect through the Services

For purposes of this Privacy Policy, “personal information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

When you use our Services, we may collect the following categories of personal information:

Information collected through Bella’s Services

- Information you directly provide to us and that we collect through our Services. We collect and store the following personal information when you submit it through our Services, by email, or offline, such as when you communicate with us about your interest in Bella, sign up for informational emails, or otherwise interact with us through our Services:
 - Personal identifiers – We may receive personal identifiers (like your name, postal address, telephone number, email address, social security number, unique personal identifiers, online identifiers, and similar identifiers). We may also generate internal ID and reference codes to identify you in our systems.
 - Communications and other submissions – We collect information and content you intentionally submit through forms, text prompts, messaging conversations (including with our concierge), product and service reviews and other feedback, as well as social media interactions and email and offline communications.
 - Financial information – If you are a Bella accountholder and have questions about how we collect, use, and share your financial information, please see our separate **Privacy Notice** [\[link\]](#). Generally, if you are not an accountholder, it is unlikely that we will collect your financial information. However, there may be situations in which you choose to provide us with financial information for a specific purpose, like purchasing merchandise or other non-financial products that we offer for sale through the Services.
 - Commercial information – We collect and generate commercial information and transactional information (such as records of products and services you have purchased or demonstrated interest in).

- Audio and visual information – We may receive photos if you submit them to us through our Services or over social media. We may record customer service telephone calls for quality purposes and to meet legal obligations. We may release functionality in the future that allows you to interact with the Services using voice prompts.
- Privacy choices – we receive and retain opt-outs and other privacy-related choices that you submit to express your preferences regarding how we collect, use, and disclose personal information, as well as related communications and correspondence.
- Information we automatically collect with cookies, web beacons, and similar technologies. Like most internet-based services, we and other companies use “cookies,” log files, beacons, pixels, and similar technology in our Services. Cookies and similar technology may collect your personal identifiers (such as IP address, device and browser identifiers and characteristics, and other identifiers), information about your device (such as operating system, browser characteristics, and language preferences), and your usage activity on the Services (such as your interactions with our website and app, the link you use to reach them, and the content (and advertising) displayed on them), as well as our content and advertising on other online sites, apps, or platforms.

Cookies are small text documents that often include an anonymous unique identifier. When you visit a website on the internet, that site’s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookies to your browser if your browser preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent by others.

You can manage or disable cookies on your device by using the tools in your browser. If you choose to disable cookies, the cookies will not be used. However, if you do choose to remove cookies or reject cookies, it may affect the features and functionality of our Services.

Analytics and ad personalization technology

We may use third-party analytics services to help us understand and improve the usage of our Services and our email and other communications. We may also use third-party services to serve ads when you use our Services and/or when you use other websites, apps, and services and to send informational and marketing emails. These services may collect your personal identifiers (like your IP address, device and browser identifiers and characteristics, and cookie information) and web browsing activity by placing cookies and using similar technology. See “Information we automatically collect with cookies, web beacons, and similar technologies” above for more information about cookies and how we use them. The third party providers who maintain these services use the information they collect to provide advertisements to you on

our Services and to provide us with analytical information that we use to improve the Services. They may also use the information they collect to show you content on other websites and services and/or combine the information they collect with information they have collected elsewhere.

We currently use Google Analytics to collect and process certain usage data on our website. To learn more about Google Analytics and how to opt out, please visit: <https://policies.google.com/technologies/partner-site>. See “*Marketing preferences and opt-out abilities*” below to learn more about your options regarding online advertising networks and opt-out options.

Information collected through social media

Bella has pages on social media services like Facebook, Twitter, LinkedIn, Instagram, and YouTube. When you interact with us on these pages or engage with our brand elsewhere on social media, we may collect information such as your likes, interests, feedback, and preferences. We may collect additional information from social media companies if you choose to share with them and they, in turn, share that information with us.

Please note that any posts you make on our social media pages (and any pictures, comments, or personal information you include when you post) are available to others who use or view those pages. Please be careful with your information and make sure that the content you share is information you are comfortable making public, since neither you nor we can control what others do with your information once you post it.

Aggregated and de-identified information

We may collect aggregated and de-identified information, and we may also de-identify and aggregate other information we receive. We use and disclose this information for legitimate business purposes.

How We Use the Personal Information We Collect

We use the personal information listed above for our business and commercial purposes. The specific uses of each category may vary depending on how you interact with us. For example, we may use your information for the purposes described below:

- *Responding to and completing your requests and transactions.* We may use the information you have provided to us (for example, the content of your communications, commercial information we have collected about you, and your financial information and personal identifiers) to answer your questions, complete your requests, and process transactions and payments you have requested.
- *Communicating with you for informational and marketing purposes.* We may use the information we have collected about you (in particular, your personal identifiers,

communications and submissions, and any audio or visual submissions you may make to us) to respond to your questions and other communications, and to send you support and service messages, informational updates about Bella, and recommendations regarding products, services, and experiences we think you may be interested in.

- *Tailoring our marketing efforts.* We may use the personal information we collect about you (including, for example, personal identifiers you provide or that we automatically collect, commercial information, communications, and social media activity) to show you content and offers that we think may be of interest to you in our app, on our websites, and on other websites and services. As explained below, we offer you choices regarding the sharing of your personal information with third parties.
- *Performing customer service.* We strive to provide concierge-quality customer service, and—depending on the nature of your request—we may use the personal information you share or that we have otherwise collected about you to provide the best customer service experience possible .
- *Providing, improving, and maintaining our Services.* For example, we may use your personal information to maintain and improve the tools and features that enable you to use our Services, to enhance our current products and services, and to develop and offer new products and services.
- *Conducting analytics and research.* We may use your personal identifiers and other information about how you and others use our Services to analyze and improve the use of our products and services and research how users interact with our Services.
- *Other general business and legal purposes.* We may use your personal information for legal and business purposes, such as complying with applicable laws and lawful civil and criminal investigations, responding to legal summons and process, exercising or defending our rights, defending against legal claims, resolving complaints and disputes, conducting internal reporting, audit, security, and anti-fraud functions, performing general compliance activities, maintaining our equipment, systems and Services, performing regulatory reporting, participating in regulatory audits, performing institutional risk management and human resources activities, and otherwise managing, operating, and maintaining our business.

If you are a Bella customer or are seeking, applying for, or obtaining our financial products and services for personal, family, or household purposes, we will treat the specific categories of your personal information as described in this Privacy Policy, unless otherwise described in Bella's separate **Privacy Notice** [[link](#)].

How We Share the Personal Information We Collect

We do not sell, trade, or license your personal information for direct marketing or similar third-party business purposes. We only use your information as disclosed in this Privacy Policy or otherwise with your consent.

With your consent or at your direction

We will share your information with third parties if you request or direct us to do so. For instance, if you say you would like us to deliver something you have ordered, you want to be connected to one of our affiliates or referral parties providing additional services, or want us to help you share something to one of your social media accounts (like on Facebook or Instagram), we will process your personal information as needed to complete your request.

With service providers who help us provide our Services

We share the personal information described above with service providers (including for example, affiliates, technology providers, referral partners, data hosting services, email and other communications vendors, and marketing agencies) that provide services to you and us, including to help us send you offers of our products and services, administer emails, maintain and provide our Services, and analyze and improve our Services. We may also provide personal information to service providers who provide us with fraud detection and security services that help us keep the Services safe. We require service providers to use personal information only for the purposes specified in our agreements.

With other third parties

We may share your personal identifiers and commercial information with advertising partners that use various technologies to send (or serve) relevant ads to users on our Services, or on platforms or websites operated by third parties.

With our affiliates and subsidiaries

We may share your personal information within our group of companies for the purposes described above. By providing your personal information to us, you understand and consent to such use and transfers.

Legal and similar disclosures

We may disclose personal information about you to law enforcement, courts, our attorneys and other advisors, as well as others who participate in the legal process, if we are required by law to do so or if we determine in good faith that the disclosure is necessary to enforce our rights, apply our **terms of service** [\[link\]](#), comply with the law, or to protect you, us, other users of our Services, or others.

Sales, mergers, and acquisitions

In the event of a merger, acquisition, initial public offering, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets (whether by private sale, through operation of law as part of a divestiture plan, or otherwise), we may provide personal information and transaction history data associated with each relevant business unit as necessary to perform industry standard work related to such activity and to complete the transaction as permitted by law or contract.

Your Privacy Choices

Updating and confirming your account details and personal information

Our separate **Privacy Notice** [\[link\]](#) describes the collection, use, and sharing of certain personal information in connection with your seeking, applying for, or obtaining our financial products and services. If you have a Bella account, you may update your account information directly by logging in to your account. You may also connect using the contact details listed below at **“Contact Us.”**

At your request and where required by law, we will confirm and/or update the personal information we hold about you, but we may have to verify your identity first.

Communications preferences

If you do not want to receive marketing messages from Bella, you may opt out by reaching out through the contact details listed below at **“Contact Us.”** If you opt out, you may still receive administrative messages, satisfaction surveys, and communications that are necessary to provide to you.

Marketing preferences and opt-out abilities

You can learn more about advertising networks and opt out of receiving personalized advertisements on your web browsers and devices from advertisers who are members of the Network Advertising Initiative (NAI) or who subscribe to the Digital Advertising Alliance’s (DAA) Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out options of each of these organizations:

- NAI: <http://www.networkadvertising.org/choices/>
- DAA: <http://www.aboutads.info/choices/>

When you opt out of personalized advertising, you may continue seeing ads as you use our Services or visit other websites and services.

Financial information sharing

Our separate **Privacy Notice** [\[link\]](#) describes how we share certain personal information with affiliates and third parties and your related rights when you apply for and use the financial products and services provided through the Bella app.

Your California Privacy Rights

California Consumer Privacy Act (CCPA)

Under the CCPA, California residents have the right to request:

- That we delete personal information we have about them;
- That we provide them additional information about whether and how we have collected, used, disclosed, and sold personal information about them;
- That we identify specific pieces of personal information we have collected about them during the prior 12 months.
- That we opt them out of the “sale” of their Personal Information (“Right to Opt Out”), which can be done at the below **“Do Not Sell My Personal Information”** link.

We also honor the right of California residents to not receive discriminatory treatment if they exercise any of the rights listed above.

“Do Not Sell My Personal Information” Choice

The CCPA defines “sale” to include sharing or disclosing of personal data with a third party for monetary or other valuable consideration. This may include when we share information about you that is associated with device identifiers with third parties for targeted advertising purposes. There are circumstances where sharing of personal information with third parties is not considered to be a sale. For example, we may share personal data with service providers who work on our behalf if the service provider agrees not to use that personal data for other purposes. In addition, you may intentionally ask us to share information with a third party, such as when you use our concierge service to complete a transaction, which is also not a sale. Bella provides the “Do Not Sell My Personal Information” link to comply with the CCPA. For more information about the “Do Not Sell My Personal Information” option, please [click here](#). We give you the ability to opt out of these sales at any time by following this “Do Not Sell My Personal Information” link below.

Requests for deletion and to know about information collected

If you are a California resident and make a request for deletion of personal information or to know about your personal information, we may require you to provide information and follow procedures to verify your identity before we respond to your request. The verification steps may differ depending on the request you make. We will match the information you provide to verify

your request to information we have on file so we can confirm your identity. If we are unable to confirm your identity or otherwise verify your request, we may ask you for additional information and/or deny your request.

California residents will be required to submit their first name, last name, and email address and may also be asked to provide their telephone number or address so that we can verify their requests. Please provide as much of the requested information as possible to help us verify your request. We will only use the information received in your request for purposes of responding to you. The request submission methods are described below at *“How to submit a request.”*

Requests by authorized agents

California law permits California residents to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California resident’s written permission that shows the authorized agent has the authority to submit a request on the California resident’s behalf. We also require the authorized agent to verify his/her own identify and to use the request submission methods described below to make a request on behalf of a California resident.

How to submit a request

You may submit a request to us by:

- Using the notifications and communications feature of the Bella app
- Emailing us at privacy@bellaloves.me

Exercising the right to opt out

You may exercise the right to opt out by:

- Clicking here: [\[link\]](#)
- Emailing us at privacy@bellaloves.me.

You may exercise your right to opt out through an authorized agent. If you do so, we will follow the same verification procedures as described above for deletion requests and requests to know about information collected.

Other California requirements

Under California’s “Shine the Light” law, California residents who provide certain personal information (as defined by California Civil Code §1798.83) in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of

customer information shared, the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year, and descriptions of the likely types of marketing the third parties would send.

To obtain this information from us, please contact us using the “Contact Us” information below with “Request for California Privacy Information” on the subject line and in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

Please be aware that not all information sharing is covered by the “Shine the Light” requirements, and only information on covered sharing will be included in our response.

How We Secure and Store Your Personal Information

We work hard to ensure that our Services will be a safe and trusted environment for you, and we are committed to protecting the personal information you share with us. In order to prevent unauthorized access, use, or disclosure of your personal information, we employ suitable physical, administrative, and technical safeguards to secure your personal information. Please note that transmission of information on the internet is not completely secure, so we cannot guarantee the security of information sent to or collected by us through our Services or otherwise, and your transmission of such information is entirely at your own risk.

Children’s Privacy

Our Services are designed for U.S. persons who have reached the age of 18. By using the Services, you affirm you are at least 18 years of age. We are not liable for any damages that may result from your misrepresentation of age.

We will not knowingly collect the personal information of children under the age of 13, and under no circumstances may anyone under the age of 13 use our Services. If you believe we may have personal information of a child under the age of 13, please contact us.

Contact Us

We welcome your feedback and are here to answer any questions you may have about this Privacy Policy, its relationship to our Privacy Notice, or Bella’s privacy practices in general. If you wish to contact us, you may reach us by means of the following contact details: privacy@bellaloves.me