

# Cookie Jar™

COOKIE JAR SAVINGS, SafetyNet, LLC

A program offered by SafetyNet, LLC  
to help employees save

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## PRIVACY POLICY FOR SAFETYNET AND COOKIE JAR

**Have questions or concerns? Please [contact our team](#) and we can help answer them.**

**Date Last Revised: July 19, 2018**

### SECURITY AND PRIVACY IS A PRIORITY OF SAFETYNET AND COOKIE JAR

SafetyNet is committed to maintaining the confidentiality, integrity and security of any personal information about our users. This Privacy Policy explains how we protect personal and other information provided through our website [cookiejarsavings.com](#) (the "Website") and our mobile application (the "App") and how we collect, use, and share that information in connection with our service offered through either of these (the "Service").

"Personal information" for purposes of this Policy means information that identifies you, such as your name, address, social security number, driver's license ID number, ID number, passport number, phone number, fax number or email address. Below, we discuss when and why we collect different types of personal information.

SafetyNet implements its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

We update this Privacy Policy periodically. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting.

If you have questions, comments, concerns or feedback regarding this Privacy Policy or any other privacy or security concern, send an email to [team@cookiejarsavings.com](mailto:team@cookiejarsavings.com).

### WE DO NOT SELL YOUR PRIVACY

We take your privacy seriously. We do not sell or rent your personal information to anyone, for any reason.

### YOU CAN DELETE YOUR DATA ANYTIME BY DELETING YOUR ACCOUNT

You may request that we delete your account for the Service. If you do so, your Personal Information will be permanently expunged from our servers and further access to your account will not be possible. We will also promptly disconnect any connection we had established to your Account Information (see below) and delete all account credentials.

However, portions of your Personal Information, in de-identified and aggregate forms, may remain on our system indefinitely. We reserve the right to use this aggregate data to improve our service and for other lawful purposes, as discussed below. Data collected and stored by SafetyNet's third party partners such as Dwolla may not be deleted.

Also, please note that we also may need to store your data as required by federal, state or local law, even if you request that we delete it.

To request deletion of your account, email [team@cookiejarsavings.com](mailto:team@cookiejarsavings.com) requesting a deletion of your account. Merely deleting the app from your device does not constitute a request to delete your account.

## SECURITY

### WE ARE COMMITTED TO KEEPING YOUR PERSONAL INFORMATION SECURE

The security of your personal information is important to us. As discussed below, we utilize physical, technical, and organizational security measures to protect against loss, misuse, and alteration of information under our control. We offer industry-standard practices and security measures to safeguard and secure the personal information we collect. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect COOKIE JAR accounts and systems from unauthorized access.

When you register for the Service, COOKIE JAR requires a password from you for your privacy and security. COOKIE JAR transmits information such as your User Profile Information or Account information securely.

### OUR SERVICE ENSURES SECURE COMMUNICATIONS WITH ENCRYPTION

All communications between your device and COOKIE JAR are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

### YOU ARE RESPONSIBLE FOR KEEPING YOUR LOGIN ID, PASSWORD, MOBILE DEVICE, AND EMAIL ACCOUNT CONFIDENTIAL

We maintain strict rules to help prevent others from guessing your password. We also recommend that you change your password periodically. Your password must be at least 8 characters in length. You are responsible for maintaining the security of your Login ID and Password. You may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at [team@cookiejarsavings.com](mailto:team@cookiejarsavings.com), but in any event you should change your password immediately via the Service.

You also agree that you control and limit access to the email account and mobile device. If your email address changes, you are responsible for informing us of that change.

We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of this Privacy Policy or the Terms of Use.

### WE COLLECT YOUR PERSONAL INFORMATION

Certain areas and features of our Website or Service are available to you without registration or the need to provide to us any personal information. However, other features of the Website or the Service may require registration, which involves provision of your name, email address, mobile phone number and a password.

When you use certain features of the Service, we collect a variety of other personal information from you. Although this information varies depending on how you use the Service, it may include such information as your name, address, phone number, email address, social security number, driver's license number, state ID card number, passport number, utility bill information, banking information/banking account and routing and login information for online financial such as your full bank account number if you choose to use it with the SafetyNet Services and other accounts. In some cases, we will collect scanned copies of such information.

### ALWAYS KEEP YOUR PERSONAL INFORMATION UP TO DATE TO GAIN FULL ACCESS

It is your responsibility to keep your personal information up to date by updating your profile at [cookiejarsavings.com](#). We are not responsible for costs or other issues arising from you not keeping your personal information up to date.

In order to benefit from the full functionality of the Service, you must provide your third-party account log ins to allow COOKIE JAR and our partners to access your account data at those financial institutions for your use.

From time to time we may request other personal information to provide you with other benefits of the Service. In all such instances, you will be given the opportunity to provide or to decline to provide that information, and it will be used only for the stated purpose.

We may combine the Personal Information we collect from you with information we collect from other sources, both offline and online. This includes any information you provide to us while using our Service as well as when, where, and how you:

1. make payments, purchases and transfers or
2. your use of our website, mobile application or services or
3. any other services provided by our partners.

Invite Friends: We offer a feature that allows you to share a message with a friend encouraging him or her to use COOKIE JAR. If you choose to use this feature, we will ask you for the recipient's name and email address, along with the text of any message you choose to include, or you may be able to use a pre-populated message. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.

### HOW WE USE YOUR PERSONAL INFORMATION

SafetyNet and its affiliated companies use your personal information obtained through the Cookie Jar program only as follows:

1. to analyze site usage and improve the Service;
2. to deliver to you any administrative notices, alerts and communications relevant to your use of the Service;
3. to market products and services that we believe may be of interest to you (you may opt out of this);
4. to fulfill your requests for certain products and services;
5. for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
6. to de-identify your personal information and create aggregated data, as discussed below;
7. to enforce our Terms of Use; and
8. as otherwise set forth in this Privacy Policy (including to protect our rights, if required by law, or relating to a transfer of control or sale of assets, as discussed below).

### HOW AND WHY WE SHARE YOUR PERSONAL AND OTHER INFORMATION

SafetyNet and its affiliated companies use third-party service providers to help us manage and improve the Service. These service providers may collect and/or use your personal or other information to assist us in achieving the purposes discussed above in the section entitled "How We Use Your Personal Information." For example, we use third parties to host features of our Service and to help us target and implement our email communications and direct mailings. We also use third-party platforms to help us manage our relationships with the people and companies that use our services. And we use third parties to assist us with market research, troubleshooting problems, and detecting and protecting against error, fraud or other criminal activity. We may also transmit your personal information to our banking partners in order to meet legal requirements.

We may also share your personal information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us or our partners; or to manage our business.

In particular, we may share certain information with financial institutions and our other partners to provide the Service features that you elect to use. For example, if you provide your online login information for financial accounts to us, we may disclose that to your financial institution or its intermediary in order to establish a connection between your financial account and your COOKIE JAR account, and thereby obtain access to your financial records. Similarly, if you link your COOKIE JAR account to other services, we may share your personal information in order to provide the Service features you have requested. And if you apply for a financial product or service, we will disclose any personal information that the financial institution requires to complete the transaction in question.

The Service contains comment fields and other features that permit you to share information publicly. The Service also may enable you to share personal information with websites or online services operated by third parties. For example, the Site contains links and widgets for third-party websites that incorporate comment and social media features. If you choose to use these features, you may disclose your personal information not just to those third-party websites and services, but also to their users and the public more generally. Because these third-party websites and services are not operated by SafetyNet, we are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your personal and non-personal information will be subject to the privacy policies of the third party websites or services, and not this Privacy Policy.

The Service also integrates certain third-party plug-ins (such as a Facebook "like" button). Even if you do not click on these plug-ins, they may collect information about you, such as your IP address and the pages that you view. They also may set and/or access a cookie. These plug-ins are governed by the privacy policy of the company providing them. Our practices with respect to cookies and other tracking mechanisms is discussed below.

SafetyNet reserves the right (and you authorize SafetyNet) to share or disclose your personal information when SafetyNet determines, in its sole discretion, that the disclosure of such information is necessary or appropriate:

1. Legal purposes. We also may use or share your personal or non-personal information with third parties when we believe, in our sole discretion, that doing so is necessary;
2. To comply with applicable law or a court order, subpoena, or other legal process;
3. To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
4. To establish, protect, or exercise our legal rights or defend against legal claims; or
5. To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.

Finally, your personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change of control, reorganization, bankruptcy, or asset sale. If we sell, merge or transfer any part of our business, part of the sale may include your personal information.

### PLAID PRIVACY POLICY

SafetyNet uses Plaid Technologies, Inc. ("Plaid") to gather End User's data from financial institutions. By using our service, you grant SafetyNet 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](#).

### YOUR ONLINE ACTIVITY: HOW WE USE COOKIES

Online Session Information and Use is Collected to Improve Your Experience

We may also collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our design and functionality and service.

### WE USE COOKIES TO IMPROVE YOUR EXPERIENCE

"Cookies" are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer's hard drive. COOKIE JAR may set and access cookies on your computer to track, gather and store preferential information about you. We encode our cookies to prevent others with whom we do not have a relationship with from being able to interpret the information stored in them.

Note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate