

Marqeta Data Privacy Framework Policy

Policy Effective Date: April 2024

This Data Privacy Framework Policy (“DPF Policy”) applies to Marqeta, Inc. and its global affiliates, including Marqeta UK LTD, Marqeta Australia Pty Ltd, and Marqeta Singapore Pte. Ltd., (collectively, “Marqeta”, “we”, “our”, or “us”), when information related to an identified or identifiable person (“Personal Data”) is received from or about individuals in the European Economic Area (EEA), United Kingdom (UK), or Switzerland in any format including electronic, paper or verbal. Marqeta respects the relationships we have with our customers and respects the privacy of all individuals whose Personal Data may be processed by Marqeta in the performance of our services and our business operations.

Marqeta is committed to protecting your Personal Data and privacy rights and that is why we comply with the EU-U.S. Data Privacy Framework (“EU-US DPF”), the UK Extension to the EU-U.S. DPF (“UK Extension”), and the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce. Marqeta has certified to the U.S. Department of Commerce that it adheres to the Data Privacy Framework Principles (“DPF Principles”) with regard to the processing of Personal Data received pursuant to the EU-US DPF, UK Extension, and Swiss-U.S. DPF. To learn more about the Data Privacy Framework (“DPF”) program, and to view our certification, please visit [DPF website](#).

This Policy supplements Marqeta’s General [Privacy Notice](#) and [Services Privacy Notice](#) (collectively, Marqeta’s “Privacy Policies”).

Processing of Personal Data

Below we describe the categories of Personal Data Marqeta may collect depending on the context of our interaction(s) with you. These categories include information you provide directly to us, information created or collected during your use of the Services, inferences we make about you when you communicate with us or use the Services, and information we obtain from other sources, such as third-party service providers and public databases.

Categories of Personal Data We Collect

- **Claim or Dispute Information:** Information you provide when you correspond with us about a claim or dispute, such as your contact information or transactional information.
- **Communications Information:** Information you provide when you communicate with us, including by phone, virtual chat, email, “contact us” forms, or social media. This may include your contact information, feedback, photographs or recordings, and language preference.
- **Contact Information:** Personal and business contact information, such as your name, telephone number, job title, email address, and office or home address.
- **Credit and Debit Card Information:** Information associated with your credit or debit card, such as your primary account number, cardholder name, expiration date and service code, as well as information pertaining to the transactions you make using the credit or debit card.

- **Device Information:** Information collected automatically about your computer or device through your web browser and other technologies, including cookies, web beacons, or other tracking/recording tools, such as your IP address, device type, unique device identification numbers, or browser type.
- **Identity Verification Information:** Information about you and your business, including Personal Data about your business' control persons and beneficial owners, such as name, job title, birthdate, gender, nationality, and government identifiers or other information used to verify such individuals' identification.
- **Inferences:** Information about your preferences and interests that we infer from your Personal Data and use of our Services, such as the topics you would like to learn more about and card usage habits.
- **Location Information:** Information about your geographic location (typically country or city-level), which may be inferred from your Device Information (e.g., from your IP address).
- **Publicly Available Information:** Information obtained from public sources and databases, such as your current place of employment.
- **User credentials:** Information you provide to us when you create a user log-in or profile in connection with the use of our Services, such as a user ID, email address, name, password, authentication information, and profile information.
- **Employment and HR Information:** Information regarding current, former and prospective partners, principals, employees and contractors of members of the Marqeta network for the purposes of operating and managing the Marqeta network, performing human resource administration and maintaining contact with individuals.

In some situations above, we may process Personal Data that is regulated as sensitive data or a special category of Personal Data under applicable data protection laws.

We may collect some of the Personal Data described above from third parties, including our customers, identity verification providers, social media services, data brokers and aggregators, and other sources, as permitted by the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. We may also obtain information from companies with whom we offer co-branded services or engage in joint marketing activities.

How We Use Personal Data. We use the Personal Data we collect for the purposes described in this DPF Policy and in our Privacy Policies. In particular, we may use any of the above categories of information to:

- Provide the Services, including to issue credit and debit cards, facilitate payments transactions, provide risk monitoring services, and manage compliance with card network rules and applicable regulations
- Verify your identity
- Identify and protect against fraudulent transactions
- Maintain, improve, and enhance our Services
- Analyze and better understand the use of our Services, including consumer spending patterns and trends
- Respond to correspondence and inquiries
- Provide cardholder support and customer service
- Perform human resource administration and other employer functions

- Perform recruitment administration and other hiring functions
- Monitor and enforce compliance with our policies, applicable laws and regulations, and contractual terms.

Please also note that when Marqeta processes your information solely on behalf of and at the direction of other companies to whom we provide our Services (e.g., when we act as a ‘data processor’), your Personal Data will be handled in accordance with our agreements with such other companies. In some cases, agreements with our customers may place additional limits on what we can or cannot do with the Personal Data we collect or receive when we provide Services to them, and we may not be permitted to use and share information in all of the ways described in this Privacy Policy. Marqeta is not responsible for its customers’ data handling practices.

To Whom We Disclose Personal Data. We may disclose your Personal Data to the following categories of recipients and for the following purposes:

- Customers: We may provide your Personal Data to our customers in order to provide our Services and fulfill transactions or requests you initiate.
- Affiliates: We may provide your Personal Data to our global affiliates. We share information with our affiliates so they can help us deliver our Services.
- Third-Party Service Providers: We may provide your Personal Data to our third-party service providers (such as IT service providers, communications providers, customer support providers, and identity verification providers) who perform certain functions for us in connection with the Services and process Personal Data on our behalf or in connection with our role as employer.
- Parties in a Corporate Transaction or Proceeding: We may share Personal Data with actual or prospective parties to an actual or potential corporate transaction or proceeding, including their representatives and other relevant participants in or during negotiations of any sale, merger, acquisition, restructuring, bankruptcy, dissolution, or a change in control, divestiture, or sale involving all or a portion of Marqeta’s business or assets.

Notice and Choice

We collect and process Personal Data from certain individuals and for the purposes described in this DPF Policy. Personal Data covered by this Policy is collected and processed only as permitted by the DPF Principles. This includes employee information collected in Marqeta’s role as a controller of data from individuals in the EEA, UK, or Switzerland and Personal Data processed in Marqeta’s role as processor to its customers.

Where Marqeta collects Personal Data directly from individuals, we will explain the purposes for which it collects and uses Personal Data about the individuals, the types of third parties to which Marqeta discloses that information, and the choices and means, if any, Marqeta offers individuals for limiting the use and disclosure of Personal Data about them. Notice will be provided in clear and conspicuous language. This explanation will be provided as soon as practicable before Marqeta discloses the Personal Data or uses such information for a purpose materially different than that for which it was originally collected or processed.

Where Marqeta receives Personal Data from its customers or affiliates when acting as a service provider processing Personal Data under the direction of a customer, Marqeta's customers or affiliates are responsible for providing appropriate notice to the individuals whose Personal Data are transferred to the United States and obtaining any requisite consent (unless this function has been delegated to Marqeta pursuant to a data processing agreement). We will use such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such Personal Data relates.

You have the right to request that Marqeta stop processing your Personal Data or that we restrict processing of your Personal Data in certain circumstances. Where practical and appropriate, you may choose whether your Personal Data is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose materially different from the purpose for which it was originally collected or subsequently authorized by the individual. For example, if you receive marketing email communications from us, you can update your preferences by using the "Unsubscribe" link found in those emails.

Accountability for Onward Transfers

Consistent with DPF Principles, transfers to third parties are covered by the provisions in this Policy regarding notice and choice. We do not disclose your Personal Data except as described in this DPF Policy or our Privacy Policies.

Marqeta maintains written contracts with these third parties, including data processing agreements with vendors and customers. Those contracts include requirements to provide at least the same level of privacy protection and security as required by the DPF Principles. Where Marqeta knows that any third party to whom it has provided Personal Data is using or disclosing that information in a manner inconsistent with this DPF Policy and/or the DPF Principles, Marqeta will take reasonable steps to prevent or stop the use or disclosure. With respect to such onward transfers to agents, Marqeta shall remain liable should its agents process Personal Data in a manner contrary to the DPF Principles and this Policy, unless Marqeta proves that it is not responsible for the matter giving rise to the damage.

Security

Marqeta will endeavor to take reasonable and appropriate technical, administrative, and physical precautions to protect Personal Data in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These measures take into account the nature of the Personal Data and the risks involved in its processing, as well as best practices in the industry for security and data protection.

Access

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, you have certain rights of access for any data Personal Data Marqeta holds and is able to modify with reasonable effort (except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, where the rights of persons other than the

individual would be violated, or where doing so is otherwise consistent with DPF Principles). These rights include:

- Right of access: You have the right to request copies of the Personal Data that we hold about you and to receive additional information from us about how your information is used.
- Right to correction: You have the right to require us to correct any inaccurate or incomplete Personal Data.
- Right of erasure: You have the right to require us (or any parties with whom we have shared your information) to delete the Personal Data that we hold about you (for example, if it is no longer necessary for the purposes for which it was originally collected or to comply with applicable law).

If you would like to correct, amend or delete the Personal Data if it is inaccurate or has been processed in violation of the DPF Principles, please send us an email at: privacy@marqeta.com. Unless prohibited by applicable law, Marqeta reserves the right to charge a reasonable fee to cover costs for providing copies of Personal Data requested by individuals.

Data Integrity and Purpose Limitation

Purpose Limitation. Marqeta collects and processes Personal Data only to the extent that it is compatible with the purposes for which it was collected or subsequently authorized by the data subject. We do not retain Personal Data after it no longer serves the purposes for which it was collected or subsequently authorized, and we take reasonable steps to ensure that Personal Data is accurate, complete, current, and reliable for its intended use for as long as we retain possession of the information.

When acting as a processor or subprocessor at the direction of customers using our Services, the collection and purposes of that data processing is controlled and handled by those customers. In these situations, Marqeta endeavors only to process Personal Data that is relevant to the services it provides and any processing agreement with the customer, only for purposes compatible with those for which the Personal Data was collected.

Exceptions for Unauthorized Disclosure. In addition to the above purposes, we may also use, transfer, disclose, or preserve Personal Data when we believe that doing so is necessary to:

- Comply with applicable law or respond to valid legal process, including from law enforcement, supervisory or regulatory authorities, or other government agencies.
- Protect our customers and others, for example to prevent attempts to commit fraud or to help prevent the loss of life or serious injury to anyone.
- Operate and maintain the security of our Services, including to prevent or stop an attack on our computer systems or networks.
- Protect our and others' rights and property, including by enforcing our agreements, terms of service, and policies.

In each case, we will take reasonable steps to ensure that your Personal Data is used and protected as described in this DPF Policy.

Recourse, Enforcement, and Liability

Internal Complaints Mechanism. In accordance with the DPF Principles, Marqeta commits to resolve complaints about the collection or use of your Personal Data. Any individuals with inquiries or complaints regarding this Policy or the use or disclosure of Personal Data in accordance with the DPF Principles should first contact Marqeta using the contact information given below. We will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of Personal Data in accordance with the DPF Principles outlined in this Policy.

If you do not receive timely acknowledgement of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact your DPA for more information or to file a complaint. The services of DPAs (including the Swiss Federal Data Protection and Information Commissioner (FDPIC) and the UK's Information Commissioner's Office (ICO)) are provided at no cost to individuals.

Independent Recourse Mechanism. Marqeta has agreed to cooperate with JAMS Mediation Services ("JAMS") with respect to complaints of individuals who are not personnel of the Company and with the local data protection authorities with respect to personnel and human resources-related information. For more information and to submit a complaint to JAMS, visit <https://www.jamsadr.com/DPF-Dispute-Resolution>.

Such independent dispute resolution mechanisms are available to individuals free of charge. Under certain limited conditions, if your complaint is not resolved through these channels, it may be possible for individuals to invoke binding arbitration before the Panel to be created by the U.S. Department of Commerce and the European Commission. For additional information, please visit <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

Employee Information. In addition, Marqeta has further committed to cooperate with the panel established by the EU data protection authorities ("DPAs") and comply with the advice given by the panel with respect to unresolved DPF complaints related to employee data transferred from the EEA in the context of the employment relationship. Marqeta also commits to cooperate with the UK's Information Commissioner's Office (ICO) and to comply with the advice given by such authorities with regard to employee data transferred from the UK in the context of the employment relationship.

Commitments as a Processor. In circumstances where Marqeta obtains or maintains Personal Data as a processor to customers, individuals may submit complaints concerning the processing of their Personal Data to the relevant customer, in accordance with the customer's dispute resolution process. Marqeta will participate in this process at the request of the client or the individual. Marqeta will take steps to remedy any issues arising out of potential failure to comply with the DPF Principles.

The Federal Trade Commission. The Federal Trade Commission has jurisdiction over Marqeta's compliance with the DPF Principles.

Contact Information.

If you have any inquiries about our collection, use, or storage of your Personal Data, would like to exercise any of your rights in relation to your Personal Data, or contact Marqeta's Data Protection Officer, please send us an email at: privacy@marqeta.com.

Inquiries can also be sent to us by regular mail at:
Marqeta, ATTN: Legal - Privacy, 180 Grand Ave, Oakland, CA 94612, USA

If you are in the European Union, you may address privacy-related inquiries to our EU representative pursuant to Article 27 GDPR:

EU: EU-REP.Global GmbH, Attn: Marqeta, Hopfenstr. 1d, 24114 Kiel, Germany
marqeta@eu-rep.global
www.eu-rep.global

Changes to the DPF Policy

Changes to this DPF Policy may be made periodically to reflect changes to our information handling practices or relevant laws. If the changes we make are material, we will provide you with prior notice and/or obtain consent regarding such changes in accordance with applicable laws. If the changes we make are not material, this DPF Policy will be updated by posting an updated version on our website. You can tell when this DPF Policy was last updated by looking at the date at the top of the Policy.