

VARO BANK ONLINE SERVICES PRIVACY POLICY

Effective: August 13, 2025

Varo Bank, N.A., (“Varo Bank”, “Varo”, “we”, “us”, or “our”) is committed to your privacy and maintaining your trust when we handle your personal and financial information.

The Varo Bank. Online Services Privacy Policy (“Policy”) describes Varo’s online and mobile privacy practices and applies to anyone who visits our websites, Varo branded social media sites or pages, uses our mobile applications (“app”), or interacts with Varo support via app, phone, or email (collectively, “Online Services”). It also describes the personal information we collect, what we do with it, how we use it, who we disclose it to, and certain information privacy rights you may have.

This Policy does not apply to non-Varo companies, partners, or third-party websites that we may link to online. Please review the privacy policies of such other websites and services you visit to understand their privacy practices.

Our [U.S. Consumer Privacy Notice](#) provides additional information about how we share information we obtain when offering financial products and services for personal, family, or household use.

If you are a California Resident, see our California Consumer Privacy Act Notice for more information.

By using Varo’s Online Services, you agree to the terms of this Policy.

Information We Collect

Depending on how you interact with our Online Services, we may collect various types of information about you. For example, we may collect:

- Contact or identity data, such as your name, mailing address, email address, phone number, date of birth, government-issued identifier (e.g., Social Security number, tax ID number, driver’s license, or other government ID), citizenship, business contact and professional information, username and password, photograph, profile picture, and other information that directly identifies you.
- Account data, such as account number, credit/debit card number, account history, account balances, loan details, information about beneficiaries and other

information related to your Varo accounts, applications, or prequalification inquiries.

- Transaction data, such as credit/debit card purchases, payment or transaction history, transaction details when you transfer money to or from your Varo accounts, and payment card details.
- Credit report information, such as your credit score, credit history, and other information that we receive from credit reporting agencies.
- Demographic data, such as gender, age, income, occupation, veteran or military status, and employment status.

When you browse our website or use our mobile apps, we may also collect:

- Device data, such as your device type, web browser type and version, operating system type and version, display/screen settings, language preferences, device contacts (e.g., to facilitate Zelle payments), photos (e.g., to deposit checks), internet protocol (IP) address, mobile network information, general location (e.g., city, state, or country), cookie IDs, device IDs, mobile advertising IDs (e.g., Apple's IDFA or Google's Advertising ID), (collectively, "Device Data").
- Online/mobile activity data, such as log-in data, information about how you use and interact with our Online Services or advertising, when and how often you use our Online Services, the webpage or advertisement from which you clicked a link to come to our Online Services (e.g., the referrer URL), and crash reports (collectively, "Online/Mobile Activity Data").
- Marketing data, such as your marketing preferences, and inferences based on your interactions with us or our partners (e.g., Online/Mobile Activity Data used for targeted advertising).
- Communications data, such as your communication preferences and details or the content of your communications with us (e.g., chat messages).
- Survey and research data, such as your responses to questionnaires, surveys, requests for feedback, and research activities.

If you inquire about or apply for a job at Varo using our Online Services, we may also collect:

- Employment application data, such as contact information, professional and employment-related information, and education history.

If you disclose any information relating to other people to us or to our service providers when you visit or use our Online Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We Collect Information

We collect information about you in a variety of contexts. For example, we may collect information:

- Directly from you. We and our service providers may collect information directly from you, such as when you apply for our products and services, use our online banking services or mobile apps, communicate with us, respond to surveys, provide feedback, or enter contests or promotions.
- Automatically when you use our Online Services. We and our service providers may collect Device Data, Online/Mobile Activity Data, and other information automatically when you interact with us online. Learn more about our use of Online Tracking Technologies below.
- From third parties. We and our service providers may receive Device Data, Online/Mobile Activity Data, and other information from third parties such as social media sites or ad providers collected when you interact with their products or services, such as if you click on one of our advertisements or interact with Varo branded social media sites or pages.
- From your external bank accounts linked to Varo. If you link a bank account or debit card from another financial institution to Varo through Plaid or another data access provider, Varo receives transaction data from those accounts.

This Privacy Policy applies to information we collect when you use our Online Services. We may combine that information with information we collect in other contexts, such as from our phone calls and emails with you, from third-party data sources for fraud prevention, identity verification, or marketing purposes, from our business partners, and from publicly available data sources. We will treat such combined information in accordance with this Privacy Policy.

How We Use Information

We use information for various purposes depending on how you interact with us. For example, we may use information about you for the purposes described below:

- Providing our products and services, such as enabling you to apply for and obtain Varo products or services, evaluating your application or eligibility for a Varo product or service, servicing and managing your accounts, providing customer service or support, communicating with you, and providing online tools and features.
- Processing transactions and payments, such as transferring funds between accounts, processing payments or transactions, fulfilling orders, and conducting settlement, billing, processing, clearing, or reconciliation activities.
- Verifying your identity, such as conducting identity verification when you apply for our products or services, authenticating your login credentials, and verifying your location to allow access to your accounts.
- Detecting and preventing fraud, such as determining fraud risk and identifying fraudulent transactions.
- Protecting against security risks, such as monitoring network activity logs, detecting security incidents, conducting data security investigations, and otherwise protecting against malicious, deceptive, fraudulent, or illegal activity.
- Advertising and marketing, such as sending you offers for special products and services via email, or text message, displaying online advertising, targeting our offers or promotions, providing sweepstakes, conducting market research, and evaluating or improving the effectiveness of our marketing efforts. Learn more about how we use Online Tracking Technology below.
- Conducting analytics and research, such as examining which parts of our Online Services you find most useful, evaluating user interface and experiences, testing features or functionality, performing debugging and error repair, and analyzing the use of our Online Services. Learn more about how we use Online Tracking Technology below.
- Improving our products and services, such as personalizing and optimizing your website and mobile experiences, recognizing you across different browsers and

devices you use, improving existing products and services, and developing new products and services.

- Carrying out legal and business purposes, such as complying with applicable laws, responding to civil, criminal, or regulatory lawsuits, subpoenas, or investigations, exercising our rights or defending against legal claims (including for collections and recoveries on past-due accounts), resolving complaints and disputes, performing compliance activities, analyzing credit risk, conducting credit reporting activities, regulatory reporting, performing institutional risk control, conducting human resources activities, and otherwise operating, managing, and maintaining our business.
- Creating aggregated and de-identified information, such as using or modifying the information described in this Privacy Policy in a manner that does not allow us to reasonably identify you. For example, we may compile aggregated statistics to understand trends or to research the percentage of users accessing a specific website feature. Information that has been aggregated and de-identified is no longer subject to this Privacy Policy.

How We Share Information

We may disclose information about you to:

- **Affiliates.** We may share information with our Affiliate, Varo Money, but do not do so for Varo Money's marketing purposes.
- **Business partners.** We may share information with companies that we have partnered with to offer or enhance products and services for Varo customers. For example, we may share information with retail or marketplace partners if you sign up for their rewards or other programs offered through Varo in order to facilitate customer service related to such rewards or programs.
- **Marketing partners.** We may allow companies to collect information through our Online Services in order to provide marketing services to us, including to target advertising to you based on personal information collected across different websites, mobile apps, and devices over time. Learn more about how we use Online Tracking Technology below to conduct personalization, analytics, and targeted advertising, and how you can opt out.

- Service providers. We use other companies to provide services on our behalf and to help us run our business. We may share information with these service providers, or they may collect information on our behalf, for various business purposes. For example, we use service providers for hosting and securing our information systems, servicing customer accounts, detecting and preventing fraud, assisting with human resources activities, communicating with our customers, providing marketing services, and analyzing and improving our Online Services.
- Other third parties with your consent or as necessary to provide our products and services. We share information with your consent or at your direction, such as when you ask us to share information with a money management app to track your finances or you link your Varo account with other websites or apps. We also may share information with third parties to provide products and services that you request, such as with merchants that are authorizing Varo credit card transactions, when you transfer funds or send money to friends and family via Zelle, other Varo payment services, and with third-party payment processors (such as Paypal).
- Credit bureaus. We share information with credit reporting agencies, such as Experian, Transunion, and Equifax, to report on or learn about your financial history and for other lawful purposes.
- Government entities and others with whom we share information for legal or necessary purposes. We share information with government entities and others for legal and necessary purposes, such as:
 - To respond to requests from our regulators or to respond to a warrant, subpoena, governmental audit or investigation, law enforcement request, legal order, or other legal process.
 - In connection with potential transactions, as described below.
 - For other legal purposes, such as to enforce our terms and conditions, exercise or defend legal claims, comply with applicable laws,
 - If we determine that disclosure is reasonably necessary or appropriate to protect the life, safety, or property of our customers, employees, contractors, or others or to assist with investigations on matters related to public safety.
- Potential purchasers and other relevant third parties in connection with a proposed or actual sale, merger, transfer, acquisition, bankruptcy, or other disposition of some or all of our assets.

- We may share aggregated and de-identified information (such as aggregated statistics regarding the use of our financial products and services) with third parties for any purpose.

Online Tracking Technologies We Use

We and service providers acting on our behalf use a variety of online tools and technologies to collect information when you visit or use our Online Services, including Device Data and Mobile/Online Activity Data. For example, we use these tools to collect information for debugging, fraud prevention, session management, and other necessary purposes. We also use these to conduct personalization, analytics, and targeted advertising on or through the Online Services. We may associate this tracking data with your Varo account (if you have one). These tools include the following:

- Tools used when you visit our website. When you visit our website we or our third-party partners may collect information automatically through use of technologies such as cookies, web beacons, web server logs, and other technologies. “Cookies” are text files that websites send to a website visitor’s computer connected to the internet to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon” links web pages to web servers and cookies in order to transmit information collected through cookies back to a web server. A web beacon is also known as an internet tag, pixel tag or clear GIF. The information we or our third-party partners collect through using these tools may include your device IP address, unique device identifier, browser type, operating system, language preference, referring URLs, date and time you visit our website, and clickstream data. Your browser may notify you about certain types of automated collection technologies and how to block them. However, if you block these tools you may not be able to use certain of our Online Services.
- Tools used when you use our app. When you use our app, we or our third-party partners may collect information automatically through device logs, server logs, and other technologies. This information may include device type, mobile operating system, device identifiers and similar unique identifiers, device settings and configurations, referring emails and web addresses, and app usage statistics. We or our third-party partners may also collect your device’s geolocation information. Your device operating system may notify you about certain automated collection technologies and how to block them. You can also manage how your device and browser share certain device data through the

privacy and security settings of your device. However, if you block these tools you may not be able to access certain of our Online Services.

- Third-party plugins. Our Online Services may include plugins from other companies, including social media companies (e.g., the Facebook “Like” button). These plugins may collect information, such as information about the pages you visit, and share it with the company that created the plugin even if you do not click on the plugin. These third-party plugins are governed by the privacy policies and terms of the companies that created them.

We and third-party providers acting on our behalf use online tracking technology to conduct personalization, analytics, and targeted advertising on or through the Online Services.

- Personalization. Varo may customize content and advertisements for our products and services on our own and third-party websites and mobile apps. In order to make the content and advertising as informative and useful as possible, we may use the information we collect about you online, alone or in combination with information about your relationship with us (such as types of accounts, transactional information, or the state in which you bank). We also use online tracking technologies to recognize your computer or device when you’re logged in, enable enhanced features or functionality, improve usability, and otherwise provide the Online Services to you. For example, Microsoft collects or receives information from you or Varo to provide Microsoft Advertising services, See Microsoft Privacy Statement for more information:
<https://privacy.microsoft.com/en-us/privacystatement>Opens in new window.
- Analytics. We and our third-party providers use online tracking technologies to engage in data analytics, auditing, measurement, research, reporting, and debugging on our Online Services and to measure the effectiveness of our advertising. For example, Varo uses Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in Google’s own privacy policy. Google may aggregate data they collect from their various services. You acknowledge and accept that Varo has no control over Google’s data collection. We strongly advise you to review Google’s privacy policy for details of their data collection practices located at www.google.com/policies/privacy/partners/, or you may want to opt out from Google Analytics please check here <https://tools.google.com/dlpage/gaoptout>

- Targeted advertising. We and our third-party providers may collect information about your activities on our Online Services and across different websites, mobile apps, and devices over time for targeted advertising purposes. These providers may then show you ads, including across the internet and mobile apps, and other devices, based in part on the information they have collected or that we have shared with them. For example, when you visit the Varo website and explore our products, our advertising providers may use that information to determine which ads to show you when you go to other, non-Varo websites. Similarly, when you view a Varo ad on your computer, our advertising providers may use that information when deciding whether to show you a subsequent ad on your laptop or mobile device.

Your Privacy Rights and Choices

Review or update your account information

You may review or update certain account information by logging into your account online. If you cannot change the incorrect information online, please [contact us](#).

Unsubscribe from our marketing emails and push notifications

You can visit the Settings screen in your account on our app to opt out of receiving our marketing emails and push notifications. Our marketing emails also contain instructions on how to opt out such emails. Please note that you may receive marketing emails from Varo up to 10 business days after submitting your request. If you opt out of receiving marketing emails, we may still send you emails about your account or for other non-marketing purposes.

Opt out of online targeted advertising

You can opt out of certain targeted advertising by adjusting the privacy settings on your mobile device (e.g., “Limit Ad Tracking” on iOS or “Opt out of Ads Personalization” on Android).

You may be able to prevent certain third parties from using your information for interest-based advertisements across the internet by visiting <http://www.networkadvertising.org> or <http://www.aboutads.info>. Doing so does not opt you out of being served all ads, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs.

Please note that your preferences will apply only to the specific browser or device from which you opt out. You will need to opt out separately on all of your browsers and devices. If you delete cookies, change web browsers, reset your mobile advertising ID, or use a different device, you may need to opt out again.

Our Online Services do not function differently in response to browser “Do Not Track” signals, but you may opt out of certain targeted advertising as described above.

Manage cookies on your device

You may be able to set your web browser to tell you when cookies are set, delete your cookies, or block cookies altogether. Please check your browser’s settings or support pages to learn how to manage cookies on your browser or device. Your decision not to accept cookies could limit access to our Online Services and features.

Manage how Varo shares your financial information

For certain consumers of our financial products and services, our [U.S. Consumer Privacy Notice](#) governs how we share certain information with affiliates and third parties, including for their direct marketing purposes, and whether you can opt out of certain types of sharing.

Exercise other privacy rights or choices

You may have additional rights under applicable law, such as the California Consumer Privacy Act for California residents. Please see our California Consumer Privacy Act Notice or contact us for more information.

Account Closure and Data Retention

You may close your Varo account at any time using any of our contact channels. Please visit our website FAQs to learn how to contact us regarding account closure. However, as a regulated financial institution, Varo retains certain information it collects for as long as reasonably necessary for the purposes set out in this Policy in accordance with applicable laws, rules, regulations and our own record retention and disposal policies. Our policies take into account the length of time personal information must be retained to provide our services; comply with legal obligations and for audit purposes; address complaints about our services; and defend or bring potential legal claims.

Information Security

Varo maintains physical, technical, and administrative safeguards designed to protect your information that we maintain. However, no method of data storage or transmission is completely secure and we cannot warrant or ensure the security of such information.

We also maintain customer authentication procedures to protect your information and account from identity theft. These procedures are for your protection. If you suspect a website or app is pretending to be a Varo website or app (also known as “spoofing”) do not enter Personal Information but instead [contact us](#). For tips about how to guard against fraud and identity theft, visit <https://consumer.ftc.gov/features/identity-theft>.

Children’s Privacy

Our Online Services are not directed to children under 13. We kindly request that children under 13 not provide information to us through our Online Services.

Social Media

Varo has official pages on social media services such as Facebook, Instagram, TikTok, LinkedIn, and YouTube. When you interact with us on these pages or 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 such information with us. Any posts you make on our official social media pages -- including posts that contain pictures, comments, suggestions, opinions, complaints, or personal information -- are available to others who view those pages. Never include sensitive personal, financial, or other confidential information such as your Social Security number, account number, phone number, mailing address, or email address when posting or commenting online. Please refer to the privacy policies of our social media partners when you interact with them online.

Updates

We may change this Privacy Policy in the future. When we do, we will post the revised Privacy Policy on our website. This Privacy Policy was last updated and became effective on the date posted at the top of this page.

Questions?

Have questions about this Privacy Policy or our privacy practices? Contact us at privacy@varomoney.com.