

Kraftworks Privacy Policy

Introduction

This Privacy Policy describes how MCA Trade AG, d/b/a Kraftworks App (“Kraftworks”, “we”, “us”, “our”) collects, uses, stores, and shares your information when (1) you access and/or use our websites, mobile applications, or other digital properties we own and operate, including <http://www.kraftworks.app> (“**Websites**”); (2) you use our services (“**Services**”); (3) you communicate with us in any manner, including by email, direct messaging, telephone, and/or in person (“**Communications**”); and/or (4) we interact with certain third parties.

1. What Type Of Information Do We Collect?

Depending on how you interact with our Websites and Services, the nature of our Communications, and how we may interact with certain third parties, we may collect the following information from and about you:

- **Identifying Information.** Information such as your full name, username and password, social security number, driver’s license number or other government identification number, telephone (including mobile number where provided), email, postal address, and other identifying information.
- **Information From Public Sources.** Information gathered from publicly available sources such as government records, the internet, and related publications.
- **Credit History.** Information about your credit history, including professional and employment background and other information we may obtain from credit bureaus.
- **Subscriptions / Preferences.** Information we obtain when you subscribe to receive updates or our newsletters.
- **Events Data.** Information we obtain concerning your attendance at our events, and your feedback relating to such events.
- **Social Media Posts.** Information concerning your posts, likes, tweets and other public interactions with social media platforms and our social media accounts.
- **Device Identifier and other Unique Identifiers.** Information such as your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, and other unique and/or persistent identifiers.
- **Internet or Other Network Activity.** Information such as your browsing or search history on our Websites, and other information regarding your interactions with our Websites, emails, advertisements, and related Communications.

- **Geolocation Data.** Information that permits us to determine your general location so that we can determine the best Services for you.
- **Commercial Information.** Information such as the Services you've considered with us, applications completed, loans sought, and related information about your commercial activities with us and other third parties.
- **Demographic Information.** Information such as your age, sex, date of birth, and related demographic information.
- **Audio and Visual Information.** Information such as photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).
- **Inferences.** Information such as inferences drawn from or created based on the information identified above.

2. How Do We Collect Your Information?

We collect your information in three ways: (1) directly from you when you use our Websites, Services, and Communicate with us; (2) automatically using online technologies when you engage with our Websites, Services, and Communications; and (3) from our third party partners.

- **Directly from you.** We collect information directly from you when you enter your information on our Websites, complete an application or other loan forms with us, apply for financing, make a payment, create an account and password, engage us to provide you with our Services, access our content, use our Websites and Services, engage in Communications with us, or sign-up to receive emails, text messages, or certain other Communications from us.
- **Automatically Using Online Technologies.** When you visit our Websites, open or click on emails we send you or related Communications, or interact with our advertisements, we or other third parties may automatically collect certain information about you using online tracking technologies such as cookies, pixels, web beacons, software developer kits, and related technologies. For more information, see Cookies and Similar Online Tracking Technologies below.
- **From Our Partners.** We collect information from our third party partners, such as data analytics providers, credit bureaus, background check providers, investigators, marketing or advertising providers, fraud prevention service providers, and vendors that provide other related services.

3. Cookies and Related Online Tracking Technologies

We and our third-party partners may use from time to time cookies, pixels, web beacons, software development kits, and other similar online tracking technologies to gather information about you when you use our Websites, interact with some of our Services, and engage with our Communications. Some of the online tracking technologies are used to maintain the security of our Websites, manage your account, prevent crashes, fix bugs, save your preferences, assist with basic Website functions, advertising, analytics, and other performance functions.

Our Websites use Google Analytics for analytics purposes. You can learn more about Google Analytics by visiting [How Google uses information from sites or apps that use our services](#).

4. How Do We Use Your Information?

We use your information for a variety of purposes, including to:

- **Provide our Websites and Services to You.** We use your information to provide our Websites and Services to you, including to: (1) create and manage your account when you sign-up to use our Services; (2) process your applications and requests for Services; (3) facilitate your access and use of our Websites; (4) process your receipts and feedback on products to facilitate your participation in the Services; (5) send you notifications relating to your account and participation in our Services; (6) answer your Communications; and (7) perform other related business functions.
- **Communicate with You.** We use your information to engage in Communications with you, such as to respond to your requests, inquiries, issues, feedback, and to provide customer service.
- **Market and Advertise.** We use your information for marketing and advertising purposes, including sending marketing, advertising, and promotional communications to you by email, text message, or postal mail. We also use your information to show you advertisements for Services and to administer sweepstakes and other contests.
- **Conduct Analytics and Personalization.** We use your information to conduct research and analytics, including to improve our Websites and Services. We also use your information to understand your interaction with our Websites, advertisements, Services, and our Communications with you. We also use your information to personalize your experience, to save you time when you visit our Websites and use our Services, to better understand your needs, and to provide personalized recommendations for our Services.

- **Security and Fraud Prevention.** We use your information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions. We also use your information to enforce our terms and procedures, prevent against security incidents, and prevent the harm to other users of our Services.
- **Legal Obligations.** We use your information to comply with our legal and regulatory obligations, to establish and exercise our rights, and to defend against legal claims.
- **Business Functions.** We use your information to support our core business functions, including to maintain records related to business management, loss prevent, collecting amounts owed, and identifying and repairing errors or problems in the Websites.

5. How Do We Disclose Your Information?

We may disclose or share your information with affiliated and non-affiliated third-parties, including in the following scenarios:

- **With your Consent.** We may disclose or share your information with your consent, which may be obtained in writing; online, through “click-through” agreements; when you accept the terms of use on our Websites; orally, either in person or on the phone; or by other means.
- **In a Business Transfer.** We may disclose or share your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.
- **To Affiliated Partners.** We may disclose or share your information with certain affiliated partners, such as those we provide services to, insurance carriers, lenders, and related third parties.
- **To Non-Affiliated Third Parties.** We may disclose or share your information with certain non-affiliated third parties to facilitate your access and use of our Websites, our Services, and to provide us with certain business functions, including but not limited to sharing your information with brand partners, internet service providers, advertising networks, data analytics providers, governmental entities, operating systems and platforms, social medial networks, and service providers who provide us a service (e.g., customer service, auditing, marketing, debugging to identify and repair errors that impair existing intended functionality on our Websites, and/or protecting against malicious, deceptive, fraudulent, or illegal activity).

- **Financial Institutions and Data Handling.** Kraftworks App uses Plaid Inc. (“Plaid”) to verify loan applicants and borrowers by securely gathering your data from financial institutions. By using our service, you authorize Kraftworks to access and transmit your personal and financial information through Plaid. You acknowledge and agree that your personal and financial information will be transferred, stored, and processed by Plaid. Additionally, Kraftworks uses Bank of America to process ACH funds transfers between your bank account and Kraftworks for the purpose of providing our services.
- **For Legal Process And Protection.** We may disclose or share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to: (1) enforce or apply our agreements; (2) protect our interests, property, or safety of others; (3) in connection with claims, disputes, or litigation; and (4) to protect our Websites.

6.How Do We Protect Your Information?

Although no system can guarantee the complete security of your information, we take commercially reasonable steps to ensure your information is protected in alignment with applicable laws and regulations, as appropriate to the sensitivity of your information.

7.How Long Do We Keep Your Information?

We keep your information for as long as is reasonably necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to nature of the information subject to disposal.

8.Links To Third Party Sites

Our Websites and Services may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review.

9.Do Not Track

Our Websites may, from time to time, collect information about your online activities, over time and across our different websites. When you use our Websites, third parties may also collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a “Do Not Track” feature, which is intended to be a signal

to websites that you do not wish to be tracked across different websites you visit. Our Websites do not currently change the way they operate based upon detection of a “Do Not Track” or similar signal.

10. Your Choices

If you no longer want to receive certain communications from us via email or text message, you may click the “unsubscribe” link in the email or reply STOP (or as otherwise instructed) to the text message. Please note that you cannot unsubscribe from Service-related Communications with us, such as messages relating to your account and transactions.

11. Children

Our Websites and Services are not intended for children under the age of 13. This includes any links to other websites that we provide for our convenience. We don’t knowingly collect the information of children under 13 for any reason.

12. Changes To Our Privacy Policy

We may change this Policy from time to time. Any and all changes will be reflected on this page, and where appropriate provided in person or by another electronic method. The effective date will be stated at the top of this Policy. You should regularly check this page for any changes to this Policy.

13. Accessibility

If you require a copy of this Privacy Policy in an alternative format, please Contact Us.

14. Contact Us

If you have questions, please contact us at **info@kraftworks.app**