

## 1. PRIVACY POLICY:

By accessing the website [www.investvoyager.com](http://www.investvoyager.com) (the "Website") or using the related services ("Services"), you hereby agree to the terms of this Privacy Policy and consent to the collection, use, and disclosure of your personal information as described below. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue accessing the Website and use of the Services.

## 2. CHANGES TO THE PRIVACY POLICY:

As used herein, 'personal information' shall mean data that can be used to identify you. The Voyager Privacy Policy covers all personal information that you voluntarily submit to Voyager and that we may obtain from our partners or affiliates. For the avoidance of doubt, Sections 3 through 9 of this Privacy Policy do not apply to non-personally identifiable information or anonymized data as it cannot be used to identify you.

Except as described in this Privacy Policy, Voyager will not give, sell, rent or loan any personal information to any third party.

You do not need to provide personal information in order to access and view the Voyager website ([www.investvoyager.com](http://www.investvoyager.com)); however, Voyager may not be able to effectively serve you and certain portions of the Services may not be available to you should you choose not to share certain information with Voyager. Voyager collects personal information in order to facilitate the provision of the Services. Voyager requires certain personal information from you for various reasons including: (a) Voyager is required by applicable law to collect certain information and (b) it is relevant for specified purposes. Any information you provide to Voyager that is not required is therefore voluntary.

Voyager collects personal information which is required under the law to confirm your identity. Voyager also collects personal information when you use or request information about the Services, request support, or interact with the Website in other ways. Some of the types of personal information that may be collected are:

- Name;
- Date of birth;
- Social security number
- Driver's license number;
- Personal identification number;
- Phone number
- Email address;
- Taxpayer identification number;
- Government identification number;
- Copies of government-issued identification; and

Other personal information, as necessary.

In addition, when you contact Voyager, request future communications from Voyager, or respond to various Voyager communications, you may provide Voyager with additional personal information pursuant to those interactions and Voyager will use such information in order to provide services.

### 3. USE OF PERSONAL INFORMATION:

Generally, Voyager will use your personal information in order to create, develop, operate and deliver the Services and maintain the information personal to you that appears on the Website. Voyager will use such information:

- To comply with Voyager's legal and regulatory obligations;
- To prevent potentially prohibited or illegal behavior;
- To verify the identity of Voyager creditors;
- To resolve disputes and troubleshoot problems;
- To enhance Website security, monitor for security risks and combat fraud;
- To communicate with you about Services as well as other, third party offerings;
- To provide or respond to any other service request.

Voyager will not use your personal information for purposes other than those purposes that Voyager will disclose to you either in this Privacy Policy or via the other methods as explained above. From time to time Voyager may request permission to allow Voyager to share certain personal information with third parties or affiliates. You may opt out of having your personal information shared with third parties, or from allowing Voyager to use your personal information for any purpose that is incompatible with the purposes for which we originally collected such information. If you choose to limit Voyager's use of your personal information, certain features of the Website may not be available to you.

### 4. THIRD PARTY SOURCES:

Voyager may, from time to time, obtain information about you from third party sources as required or permitted by applicable law, rule or regulation. These third-party sources include public databases, credit bureaus, ID verification partners, resellers and other partners, joint marketing partners and social media platforms.

Voyager obtains information about you from public databases and ID verification partners for purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information may include: your name, employment status, public employment profile, credit history, status on any sanctions list maintained by public authorities, and other relevant data. Voyager obtains

such information in order to comply with various legal and regulatory obligations, including but not limited to Voyager's anti-money laundering obligations. In some cases, Voyager may process additional data about you to ensure that the Services are not being used for fraudulent purposes or other illicit activities.

Once personal information is obtained from you, Voyager does not subsequently share it with any other third parties except as described in this Privacy Policy. However, such information may be shared with Voyager affiliates as necessary.

## 5. PERSONAL INFORMATION SHARING WITH OTHER PARTIES:

Voyager takes care to protect your personal information and limits access to your personal information to those who need such information in order to perform their tasks and duties and to share with third parties who have a legitimate purpose for accessing such information. Personal information will only be shared in the following instances:

Voyager will share your information with financial institutions with which Voyager partners in order to process payments and transactions that you authorize.

Voyager will share your information with third parties with which Voyager partners in order to convey transaction history information to you for purposes of preparing your personal tax returns or other required filings.

Voyager may also utilize your personal information and share such information with law enforcement, government officials, or other third parties when Voyager is compelled to do so by subpoena, court order, or similar legal procedure or when Voyager believes in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of the Voyager User Agreement or any other applicable policies.

Voyager may share your information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Voyager's assets as part of its bankruptcy.

Voyager may also share your information with directly affiliated firms.

## 6. HOW VOYAGER PROTECTS AND STORES PERSONAL INFORMATION:

Voyager maintains (and requires its affiliates and service providers to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information that you share with Voyager. Voyager may store and process all or part of your personal and transactional information, including payment information, such as your encrypted bank account and/or routing numbers, in the United States and elsewhere in the

world. Voyager employs efforts to protect your personal information by maintaining physical, electronic and procedural safeguards in compliance with applicable laws and regulations.

Voyager uses computer safeguards such as firewalls and data encryption, physical access controls to Voyager buildings and files, and restricts personal information access to authorized personnel only.

Despite these procedures, Voyager cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. In addition, Voyager notes that you also play a vital role in protecting your own personal information. When choosing login credentials Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third parties and to immediately notify Voyager if you become aware of any unauthorized access to or use of your Voyager Account.

Voyager cannot ensure or warrant the security or confidentiality of information that you transmit to Voyager or receive from Voyager by internet or wireless connection, including email, phone, or SMS, since Voyager does not have any way of protecting information once it leaves and until it reaches Voyager. If you have a reason to believe that your data is no longer secure, please contact Voyager at the email address or telephone number listed at the end of this Privacy Policy.

#### 7. HOW TO ACCESS OR CHANGE YOUR PERSONAL INFORMATION:

You are entitled to review, correct or amend your personal information or to delete such information where such information is inaccurate. You may do this at any time by logging into the Website and updating your information. Your right to update and amend personal information shall be limited where the burden or expense of providing you such access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than yourself would be violated.

Despite its bankruptcy, your Voyager Account information will be maintained in our database in order to return value to you and deter fraud. However, your personal information will not be used by Voyager for any further purposes, except as detailed above.

#### 8. RETENTION OF PERSONAL INFORMATION:

Voyager will retain your personal information for a minimum of five (5) years, or as necessary to comply with Voyager's legal and regulatory obligations, or as needed in order to resolve any disputes.

## 9. AUTOMATIC COLLECTION OF INFORMATION:

Voyager stores certain types of information automatically, including whenever you interact with the Website. The information that is generated through these interactions does not necessarily reveal your identity directly but may include information about the specific device you are using to access the Website, such as the hardware model, operating system version, web browser software and your Internet Protocol address, unique device identification number, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location and other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser. Voyager may also collect information about how your device has interacted with our Website, including pages accessed and links clicked. Voyager may use identifiers to recognize you when you enter the Website via an external link, such as a link appearing on a third-party site.

## 10. CALIFORNIA PRIVACY RIGHTS:

If you are a California resident, you have the right to request information from Voyager regarding the manner in which Voyager shares certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to Voyager at Voyager's designated address and receive the following information:

The categories of information that Voyager disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year;

The names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by emailing [support@investvoyager.com](mailto:support@investvoyager.com)

## 11. VOYAGER CONTACT INFORMATION:

If you have any questions or concerns regarding this Privacy Policy, or if you have a complaint you should first contact us either by emailing us at [support@investvoyager.com](mailto:support@investvoyager.com), via our support selection within the app.