

# Visa U.S. End User Open Banking Privacy Notice

**Effective date: April 24, 2024**

Visa values your trust and respects your privacy. This U.S. Open Banking Privacy Notice ("**Privacy Notice**") explains how Tink U.S. Inc and its Affiliate<sup>1</sup> company Visa. ("**Visa**", "**we**," and/or "**us**") collects, uses, and shares your Personal Information when you use our Open Banking Services (as defined below), and related services that link to this Privacy Notice.

## **About our Open Banking Services**

Visa's open banking platform enables our business customers ("**Providers**") to build services that leverage individuals' ("**End Users**" or "**you**") financial information.

We provide account information services, payment initiation services, and other related open banking solutions ("**Open Banking Services**") to End Users and Providers, which allow End Users to share their financial information with Providers or to make payments.

When you request services from a Provider, the Provider will redirect you to Visa's open banking platform, where we can collect your financial information or initiate a payment on your behalf. Once this process is concluded, you are redirected back to the Provider.

## **Scope of this Privacy Notice**

We fulfill many roles when providing our Open Banking Services.

When we provide Open Banking Services directly to End Users, End Users will sign up to Visa's Open Banking Terms and Conditions. In this scenario, this Privacy Notice applies to the collection, use and sharing of End Users' Personal information that Visa processes in connection with the provision of the Open Banking Services.

When we act on behalf of Providers, we only collect, use, and share Personal Information as authorized by contracts with Providers. In this scenario, the privacy notice provided by the Provider with which the End User has a relationship will apply. This Privacy Notice does not cover what others – such as Providers or other service providers, websites and applications – do with your Personal Information. If you have questions about how those companies handle your Personal Information, or wish to exercise your rights, please contact them directly.

This Privacy Notice also does not cover Personal Information we collect through our website, or when you interact with our websites. Please read the privacy notices published on our websites or otherwise provided to you when you interact directly with Visa.

In this Privacy Notice, "**Personal Information**" refers to information that (alone or when used in combination with other information) is capable of being associated with or could reasonably be associated with an individual. Personal Information, sometimes referred to as "personal data", may also have specific meanings under different privacy laws. The Personal Information we collect varies depending on our relationship and interactions with you.

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<sup>1</sup> Affiliates are companies related by common ownership or control.

## Categories of Personal Information

Depending on our relationship and interactions with you, the categories of Personal Information we collect may include:

- Contact Information – this includes your name, title, date of birth, username, mailing address, email address, telephone number, mobile number, and social media profile names, along with other personal identifiers.
- Account Information – this includes:
  - bank credentials (your bank username, password, and the unique authentication token used to identify you as the owner of your account); and
  - bank account number, bank account title and type (e.g. loans, mortgages, savings, investments, pensions, checking accounts), bank name and branch location.
- Transaction Information - this includes:
  - information about your transactions, including purchases, description, currency, date, time, location, amount of the transaction and information about the merchant. This may also include item-level data in some instances, and billing and shipping information;
  - information about initiated payments, including payment description, amount, currency, date, source, destination and registered beneficiaries; and
  - other information you provide to us, such as data collected for End User authentication.
- Business Customer Data – this includes information about your role within your company, your authorization to use products or services, and your authority to place orders, customer/supplier qualification details, and other data you share with us in connection with the relationship.
- Inferred and Derived Information – we infer and derive data elements by analyzing our relationship and transactional information. For example, we may generate propensities, attributes, and/or scores for marketing, security, or fraud purposes.
- Online and Technical Information – this includes information about how you use our Open Banking Services and your interactions with websites or applications that you use to access the Open Banking Services, including IP address, device identifiers, settings, characteristics, activity log records, and other information collected using cookies and similar technologies.
- Government Issued Identification Numbers – this includes social security number, driver's license number, passport number, and other government issued identifiers as may be needed for compliance or given the nature of the relationship.
- Geolocation Information – this may include precise geolocation information, which we may collect automatically from your mobile device.
- Compliance Data – this includes records maintained to demonstrate compliance with applicable laws, records related to consumer preferences (such as your opt-ins and opt-outs), and records related to data subject rights requests.

### Sources of Personal Information

We may collect Personal Information about you from various sources, depending on our relationship and interaction with you. We may collect Personal Information:

- from you;
- from Providers - depending on the Open Banking Service you use, we may collect your Personal Information from Providers;
- from your bank - the Open Banking Services may require us to collect Personal Information from your bank. We only collect this type of information with your explicit consent;
- from other sources - when you use our Open Banking Services, we may receive identifiers and commercial information about you from other third parties including our service providers and identity verification services;
- from your computer or devices - we may collect Personal Information when you use our Open Banking Services on your device; and
- Other third parties, including data processors, social media companies, and other publicly available sources.

### Why We Collect Personal Information and How We Use It

Purpose for Collecting and Sharing	Categories of Personal Information
Provide, maintain, and enhance our Open Banking Services	Contact Information Account Information Transaction Information Business Customer Data Inferred and Derived Information Online and Technical Information Government Issued Identification Numbers Compliance Data
Provide customer support to you or Providers in connection with our Open Banking Services	Contact Information Account Information Transaction Information Business Customer Data Online and Technical Information Government Issued Identification Numbers Compliance Data
Provide you and Providers with certain information that we derive from your Personal Information, such as your income based on your pay checks or your regular payments (e.g. utilities, rent subscription services). Providers	Contact Information Transaction Information Inferred and Derived Information Online and Technical Information

may use this information, for example, to categorize your transactions and provide recommendations to you	
With your consent, for any other activities you request	Contact Information Account Information Transaction Information Business Customer Data Inferred and Derived Information Online and Technical Information Government Issued Identification Numbers Compliance Data
Generate de-personalized, de-identified, anonymized, derivatives, compilations, combinations or aggregated datasets, which are used for product development, troubleshooting, compliance reports, technical support and delivery of services to individuals, Providers and other third parties	While certain information such as Transaction Information, Account Information, Inferred and Derived Information and Online and Technical Information may be used for these activities, the end result does not constitute Personal Information
Understand how you and others use our Open Banking Services, for analytics and modelling and to create business intelligence and insights and to understand economic trends	While certain information such as Transaction Information, Account Information, Relationship Information, Interaction Information, Inferred and Derived Information, Geolocation Information and Online and Technical Information may be used for these activities, the end result does not constitute Personal Information.
Support our Everyday Business Purposes, such as for account management, quality control, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance, analytics and research, enforcement of contracts and other contract management, and the provision of requested products and services*	Contact Information Account Information Transaction Information Business Customer Data Inferred and Derived Information Online and Technical Information Government Issued Identification Numbers Geolocation Information Compliance Data

\* "Everyday Business Purposes" encompasses the following business purposes and related purposes for which Personal Information may be used:

- to provide the information, product, or service requested by the End User or as reasonably expected given the context in which the Personal Information was collected (such as customer

credentialing, providing customer service, personalization and preference management, providing product updates, ensuring data is complete and accurate, bug fixes or recalls, and dispute resolution);

- for identity and credential management, including identity verification and authentication, and system and technology administration;
- to protect the security and integrity of systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats;
- for fraud detection and prevention;
- for legal and regulatory compliance, including all uses and disclosures of Personal Information that are required by law or reasonably needed for compliance with company policies and procedures, such as anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;
- for corporate audit, analysis, and reporting;
- to enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- to de-identify, depersonalize, or anonymize the data or create aggregated datasets, such as for consolidating reporting, research, or analytics;
- to make back-up copies for business continuity and disaster recovery purposes; and
- for corporate governance, including mergers, acquisitions, and divestitures.

### **Categories of Third Parties and Our Disclosure of Personal Information**

We may disclose your Personal Information to:

- Third parties, with your consent.
- Our Affiliates.
- Our service providers, for the purposes of providing services to us. Our service providers may use anonymized or aggregated datasets for permitted business purposes such as conduct analytical research, performance tracking, benchmarking, product development, troubleshooting and technical support. Anonymous and aggregated datasets do not include your Personal Information.
- Providers, banks, data aggregators, payment processors, and other third parties that are subject to appropriate confidentiality and use restrictions, for the purposes of providing Open Banking Services to you, managing fraud and risk, providing and developing our Open Banking Services, and supporting our Everyday Business Purposes.

- Third parties, such as third-party advertising partners, to help us with our online advertising programs.
- Your company and its Affiliates (for Business Customer Data).
- Government agencies.

We may also disclose Personal Information when required to do so by law, such as to law enforcement agencies, regulators, or courts, or as permitted by law, such as when we sell or transfer business assets, enforce our contracts, protect our property or the rights, property or safety of others, or as needed for audits, compliance, and corporate governance.

When you are no longer our End User, we may continue to process your Personal Information as described in this Privacy Notice, to the extent required, for the purposes of providing customer support to you or Providers, with your consent or to support our Everyday Business Purposes.

### **Your Privacy Rights**

We respect your rights to access, correct, delete and withdraw your consent to process your Personal Information in accordance with applicable laws. You can submit requests under relevant laws to us via the [Privacy Rights Portal](#).

Federal laws may provide you with rights relating to the financial information we collect from your bank. See the *Consumer Financial Privacy Notice* posted at the bottom of this Privacy Notice for more information on your consumer financial rights.

Residents of some states have additional privacy rights. See the *California Privacy Rights Notice* on Visa's privacy center for more information on your rights under state laws.

For security reasons and to prevent unauthorized disclosure of Personal Information, you may need to contact the Provider or the banks who you have a relationship with to access your relevant information. This helps ensure that access to the information is only provided to the authorized individuals, subject to verification processes.

### **International Transfers**

We may transfer your Personal Information between countries, including to countries which may not have similar privacy or data protection laws as your country of origin. However, we will always protect your information as described in this Privacy Notice, no matter where it is stored, and transfer it in accordance with any applicable legal requirements for cross-border transfer of Personal Information.

### **Information Security and Data Retention**

We use physical, technical, organizational, and administrative safeguards to help protect your Personal Information from unauthorized access or loss. For example, we use encryption and other tools to protect sensitive information.

We retain your Personal Information as needed for the purposes listed above and as permitted by law.

### **Children's Personal Information**

Visa's Open Banking Services are not directed to children, and Visa only collects information from children as permitted by law. For example, we may collect Personal Information from children over 16 who are allowed by law to interact with Visa or otherwise if we have appropriate parental or caregiver consent. If you believe that we are processing a child's Personal Information inappropriately, please contact us at [contactopenbanking@visa.com](mailto:contactopenbanking@visa.com).

### **Changes to this Privacy Notice**

We will make changes to this Privacy Notice from time to time. For example, we may make changes to this Privacy Notice to keep it up to date or to comply with legal requirements or due to changes in the way we operate our business. Any changes or updates we may make will be posted on [visa.com/privacy](https://visa.com/privacy) so that you are aware of the impact to our data processing activities before you continue to engage with us. If we have your contact details on file we will notify you in advance of any significant changes that are material or may otherwise impact you. Please check back frequently to see the latest version on our website.

### **How to Contact Visa**

If you would like to exercise your privacy rights under relevant laws, please reach out us via the [Privacy Rights Portal](#).

For any other assistance you may contact us at the information below:

- Email us: [contactopenbanking@visa.com](mailto:contactopenbanking@visa.com).  
*Please do not include sensitive information, such as your account number, in emails.*
- Mail us a letter:  
Visa Global Privacy Office  
900 Metro Center Blvd.  
Foster City, CA, 94404 USA

## Consumer Financial Privacy Notice

Tink U.S. Inc, a Visa Inc. Affiliate company, operates Visa’s open banking platform and is responsible for collecting and processing your Personal Information as required to provide the Open Banking Services. This Consumer Financial Privacy Notice is provided by Tink U.S. Inc.

FACTS	WHAT DOES TINK DO WITH YOUR PERSONAL INFORMATION?
<b>Why?</b>	Financial companies choose how they share your Personal Information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your Personal Information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of Personal Information we collect and share depend on the product or service you, or the Provider you are connecting to, use. This information can include:</p> <ul style="list-style-type: none"> <li>■ Social Security number and income</li> <li>■ Bank account numbers and account balances</li> <li>■ Account transactions and transaction history</li> <li>■ Information about initiated payments</li> </ul> <p>For more information on the types of Personal Information we collect, please see the “<i>Why We Collect Personal Information and How We Use It</i>” section of our Visa U.S. Open Banking Privacy Notice.</p> <p>When you are <i>no longer</i> our customer, we continue to use and share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share customers’ Personal Information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ Personal Information; the reasons Tink chooses to share; and whether you can limit this sharing.

Reasons we can share your Personal Information	Does Tink share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	No	We do not share



<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We do not share
<b>For our affiliates to market to you</b>	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

<b>Questions?</b>	Contact us at <a href="mailto:contactopenbanking@visa.com">contactopenbanking@visa.com</a>
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<b>Who we are</b>	
<b>Who is providing this notice?</b>	Tink U.S. Inc.
<b>What we do</b>	
<b>How does Tink protect my Personal Information?</b>	To protect your Personal Information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Tink collect my Personal Information?</b>	<p>We collect your Personal Information, for example, when you:</p> <ul style="list-style-type: none"> <li>■ Sign up for our Open Banking Services</li> <li>■ Use our Open Banking Services on your device</li> <li>■ Provide consent for us to obtain your Personal Information from your bank or a Provider</li> </ul> <p>We also collect your Personal Information from other companies as explained in more detail in the "<i>Sources of Personal Information</i>" section of our Visa U.S. Open Banking Privacy Notice</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes— information about your creditworthiness;</li> <li>■ affiliates from using your information to market to you;</li> <li>■ sharing for nonaffiliates to market to you.</li> </ul>

	State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Our affiliates include Visa U.S.A., Inc and Tink AB.</i></li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Tink does not share with nonaffiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>■ <i>Tink does not joint market</i></li> </ul>
<b>Other important information</b>	
California: If you are a resident of California, we will not share Personal Information we collect about you except to the extent permitted under California law and in accordance with our California Privacy Rights Notice.	