

PRIVACY POLICY

Introduction

acrew, Inc. (“acrew,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us in using our mobile application and website (collectively, the “Platform”) and the services provided through the Platform (collectively, “Services”).

If you are an acrew member “Member”, we will use and share any information that we collect from or about you in accordance with our GLBA Consumer Privacy Notice (provided below), which offers you certain choices with respect to the use and sharing of your personal information.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage with an updated “Last Modified” date above. Please review this Privacy Policy periodically.

1. Collecting and Using Personal Information

Personal Information We Collect Online

We collect Personal Information from you through your use of the Platform and Services. “Personal Information” is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personal Information:

a. Personal Information You Provide

We may collect the following Personal Information that you voluntarily provide to us:

- To become a Member on the Platform, you will provide us with certain Personal Information, which may include your first and last name, phone number, and email address. You will be assigned an acrew membership number and will need to establish a password for future sign-ins.
- To interact with the Platform or Services, you may send us feedback, questions, comments, suggestions, ideas or interact with us in any other way, and you may need to provide us with your log-in information, name and email address.
- To apply for a job, you will provide us with your name, email address, and any other Personal Information that you may provide in your resume or featured on your LinkedIn profile.
- To contact us, you will provide us with your name and email address.

b. Personal Information Collected as You Navigate the Platform

We automatically collect certain Personal Information through your use of the Platform and Services, such as the following:

- We collect usage information, such as which of the pages on the Platform you access, the frequency of access and what you click on while on the Platform.
- We collect information about the device you are using to access the Platform, such as hardware model, operating system, application version number and browser.
- In addition to the device information listed above, when you access the Platform on your mobile device, we collect and aggregate information about whether you are accessing the Platform via a mobile device or tablet, device type and carrier.
- We collect location information from Platform visitors on a city-regional basis.

c. Personal Information Collected from ZYNLO Bank

As expressed in our Terms and Conditions, we will collect information about your consumer financial information in your acrew HomeSavings by ZYNLO account “Account” pursuant to Section 1033 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. This includes deposit and withdrawal details.

d. Third Party Personal Information

In some cases, we may receive certain Personal Information from you about a third party including those of real estate service providers or mortgage lenders you may be currently working with. For example, as part of our account registration process, you may provide the name, email address, and phone number of a third party. If you submit any Personal Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personal Information in accordance with this Privacy Policy.

How We Use Your Personal Information

We use the Personal Information we collect to provide the Platform and Services to you, to improve our Platform and Services, and to protect our legal rights. In addition, we may use the Personal Information we collect to:

- Process your membership registration;
- Provide you with a link to open an Account with ZYNLO Bank;
- Provide acrew Reward Points;
- Provide you with access to our Down Payment Assistance Finder;
- Provide you with the option to connect a mortgage loan or real estate officer;

- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about the Platform or Services or to inform you of any changes to the Platform or Services;
- Provide support;
- Maintain and improve the Platform and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

How We Share Your Personal Information

We may share the Personal Information that we collect about you in the following ways:

- With service providers who perform data or Platform-related services on our behalf (e.g. hosting, maintenance, backup, analysis, etc.);
- With mortgage lenders in connection with the Down Payment Assistance Finder Tool or acrow Home Preparation Program;
- With real estate agents who you may decide to contact through the Platform;
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Information;
- To any other person or entity as part of any business or asset sale; and
- To any other person or entity where you consent to the disclosure.

You acknowledge and agree that acrow may receive certain incentive compensation from mortgage lenders and real estate agents with whom we share your Personal Information.

2. Cookies and Other Tracking Technologies

How We Use Cookies

Like many other businesses, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;

- Understand and save your preferences for future visits, allowing us to customize the Platform and Services to your individual needs;
- Advertise new content and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Compile aggregate data about Platform traffic and interactions to resolve issues and offer better Platform experiences and tools in the future; and
- Recognize when you return to the Platform.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve the Platform and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Contentsquare, and other similar companies.

How You Can Opt-Out of Cookies

- Browser Settings. Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Platform. You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org.
- Platform Controls. You can opt out of Cookies set by specific entities by following the instructions found at these links:
 - Google: <https://adssettings.google.com>
 - Facebook: <https://www.facebook.com/about/ads>
 - X: <https://x.com/settings/account/personalization>
- Advertising Industry Resources. You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the Network Advertising Initiative's website or the Digital Advertising Alliance's website. For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's
- Mobile Choices website. Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use. We also use mobile advertising identifiers (e.g., Apple's Identifier for Advertising ("IDFA") or Google's Android Advertising Identifier ("AAID")). Most mobile devices include an identifier that allows application publishers, such as us, and marketers to track user activity on mobile devices for advertising purposes. We use mobile advertising identifiers for the same purposes for which we use cookies.

Hojar Analytics

We use Hotjar Analytics, a web analytics service provided by Content Square, Inc. Hotjar Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Platform and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Content

Square may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Hotjar Analytics do not gather information that personally identifies you. The information generated by Hotjar Analytics will be transmitted to and stored by Content Square and will be subject to Content Square's privacy policies. You can opt-out of Cookies managed by Content Square by enabling the "Do Not Track" setting in your browser's settings.

3. Third Party Processors

To ensure that your Personal Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws.

4. Choices About Your Personal Information

Review and Request Changes to Your Personal Information: You may use your account to access, correct, or view certain Personal Information we have collected and which is associated with your account. To review or request changes to any of your Personal Information, please contact us at hello@acrewsavings.com.

Marketing Communications: To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at hello@acrewsavings.com.

5. Security

We maintain commercially reasonable security measures to protect the Personal Information we collect and store from loss, misuse, destruction or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee absolute security.

6. Third Party Links

The Platform and Services may contain links that will let you leave the Platform and access another website. Linked websites are not under our control. This Privacy Policy applies solely to Personal Information that is acquired by us on the Platform. We accept no responsibility or liability for these other websites.

7. Children's Privacy

The Platform and Services are not intended for individuals under eighteen (18) years of age. We do not knowingly collect, use or disclose personal information from individuals under eighteen (18) years of age.

8. How to Contact Us

To contact us for questions or concerns about our privacy policies or practices please email us at hello@acrewsavings.com.

9. GLBA CONSUMER PRIVACY DISCLOSURE

The disclosure that follows directly below is only applicable to Members and those consumers who have previously attempted to sign up for acrew's products and services. It DOES NOT apply to consumers visiting the acrew website who are neither acrew members nor individuals who have previously attempted to sign up for acrew products and services.

	What does acrew do with your personal information?
Why?	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.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none">• Income• Payment history and employment information• Credit history and credit scores
How?	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 acrew chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does acrew share?	Can you limit this sharing?
For our everyday business purposes – such as executing the acrew Reward Points program, preparing you for the acrew Home Preparation Program, or responding to court orders and legal investigations.	Yes	No
For our marketing purposes - to offer our products and services to you.	Yes	No
For joint marketing with other financial companies	No	We don't share

For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

To limit our sharing, email us at hello@acrewsavings.com. Please note, if you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

What we do	
How does acrew protect my personal information?	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.
How does acrew collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> ● Use our Down Payment Assistance Finder Tool ● Give us your contact information ● We also collect your personal information from others, such as ZYNLO Bank, affiliates or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ● sharing for affiliates' everyday business purposes – information about your creditworthiness ● affiliates from using your information to market to you ● sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	You choices will apply to everyone on your account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. acrow does not share with its affiliates.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. We do not share your information with non-affiliates.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. acrow does not jointly market.