

# Privacy Policy

Altro, Inc. (“Altro” or the “Company”) (“Altro,” the “Company,” “we,” “us” and/or “our”) is dedicated to protecting your personal information and informing you about how we use it. This privacy policy (the “Privacy Policy” or the “Policy”) is intended to provide information to our visitors and users (“you” or “your”) about how we collect, protect, share and use your information when you use the Altro website, [www.altro.io](http://www.altro.io), including any subdomain thereof (the “Website”), the Altro mobile application (the “App”) and/or products and services offered, operated or made available by, or through, the Company (the Website, App and products and services of Altro are collectively referred to as the “Services”. Reference to the Services includes any portion of the Services).. This Privacy Policy outlines how and when Altro collects, protects, shares, and uses information that can identify you individually (“Personal Information”), such as your name, email, or telephone number. Personal Information does not include information that is anonymous, aggregated, or can no longer be used to identify you as an individual.

This Privacy Policy covers the privacy practices of Altro only. This Policy does not apply to the practices of third-party websites, services, applications, or other third parties with which we contract. These third-party services are governed by each such third party’s privacy policy. Altro is not responsible for the privacy policies and practices of websites other than that of Altro, and Altro is not responsible for the failure of unaffiliated third parties to honor their privacy obligations.

Altro works with many Issuing Banks to offer you financial products and services. This Privacy Policy does not cover any Personal Information that you provide in order to obtain those financial products and services from the Issuing Banks or that result from your use of financial products and services provided by the Issuing Banks. The Issuing Bank’s privacy policy will apply to any Personal Information related to financial products and services provided by that Issuing Bank; you should carefully review the privacy policy of any Issuing Bank before obtaining financial products and services offered by them.

Altro shares personal information for Altro credit card applicants and borrowers with our partner bank, Hatch Bank. You can review Hatch Bank’s privacy practices [here](#).

We may amend this Privacy Policy at any time by posting a revised version on our Website and the App. The revised version will be effective at the time we post it.

## Acceptance of Privacy Policy

By using the Website or App, you signify your acceptance of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Website or App.

Your continued use of the Website or App following the posting of changes to these terms will mean that you accept those changes.

If you breach or violate the rules, restrictions, limitations, terms, and/or conditions that apply to the Website, the App, or in connection with the Services, or otherwise communicated to you, Altro may terminate, discontinue, suspend, and/or restrict your ability to access, visit, and/or use the Website, App and the Services, with or without notice. Altro may further restrict or refuse to provide you with any future access and/or use of the Services. Finally, Altro reserves the right to take any technical, legal, and/or other actions that it deems necessary and/or appropriate, with or without notice.

## Information We Collect About You and How We Collect It

We collect certain information from and about visitors and users of our Website, including:

- Information by which you may be personally identified, such as your name, email address, and phone number;
- Information about your internet connection, the equipment and devices you use to access our Website, the dates and times you use the Website, and other Website usage;
- Payment information you provide; and
- any other information you may provide to us voluntarily through your use of our Services.

We collect this information:

- Directly from you when you provide it to us through the Website; and
- Automatically as you navigate the Website, including IP addresses, and information collected through cookies and other tracking technologies; and From third parties, for whom you authorize Altro to access your consumer financial data as your agent pursuant to the authority provided in Dodd-Frank Act Section 1033.

## Information You Provide To Us

The information we collect on or through our Website includes:

- Information you choose to provide to us when you use the Website to request or obtain our Services or otherwise interact with us, which may include your name, email address, and phone number (together, your “Personal Information”);
- Information we may request from you if you enter a contest or promotion we sponsor or when you report a problem with our Website;
- Records and copies of your correspondence with us, if you contact us; and

- Details of transactions and search queries you may carry out through the Website.

## How We Use Information

In general, Altro uses information we collect through the Website to:

- Provide products and services you request;
- Improve our offerings to you, including to develop new products and services;
- Communicate with you or provide notices in connection with such products and services;
- Process and respond to customer inquiries and provide support;
- Detect security incidents and prevent fraud and illegal activities;
- Fulfill our legal requirements and enforce our agreements;
- Improve Site content, functionality, and usability;
- Communicate with you, either directly or through our service providers, including for marketing and promotional purposes;
- Improve our marketing and promotional activities; and
- For our other legitimate business purposes permitted by law.

## Information We Share

We may disclose aggregated information about our users, and information that does not identify any individual, without restrictions.

Unless otherwise stated, we may disclose Personal Information that we collect or you provide as described in this Privacy Policy:

- To our service providers, contractors, and other third parties who support our business operations;
- To fulfill the purpose for which you provide any Personal Information;
- For any other purpose we disclose when you provide any Personal Information; and,
- With your consent.

We may also disclose Personal Information:

- To law enforcement, government officials, or other third parties when (1) we are compelled to do so by a subpoena, court order, or similar legal procedure, (2) we need to do so to comply with law, or (3) if we believe in good faith that the disclosure of your personal information is necessary to prevent physical harm or financial loss or to report suspected illegal activity;
- To enforce or apply the terms of this Privacy Policy and other agreements between you and us, including for billing and collection purposes; and

- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Altro, our service providers, our customers, or others.

Altro will not sell or rent any of your personal information to third parties and only shares your personal information with third parties as described above.

## How We Protect Information

No method of transmission over the Internet or electronic storage is 100% secure; however, we care about the security of your information and take reasonable measures designed to protect your personal information from unauthorized access and use by maintaining physical, electronic, and procedural safeguards in compliance with applicable law. These measures include computer safeguards and secured files and buildings.

You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from us at all times. However, we cannot ensure or warrant the security of any information you transmit to us or guarantee that information may not be accessed, disclosed, altered, or destroyed. By using our Website and/or Services, you agree to assume all risk in connection with the information sent to us or collected by us when you access, visit, and/or use the Service. This includes, without limitation, any personally identifiable information that you provided to Altro. Altro is not responsible for any loss of such information or the consequences thereof.

In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

## Third-Party Websites

This policy only applies to our website, apps, or online services. Our Services may contain links to other websites, apps or online services not operated or controlled by Altro ("Third-Party Websites"). The policies and procedures described here do not apply to Third Party Websites. By providing links to Third-Party Websites or services, we do not imply that we endorse or have reviewed such websites or services. We suggest that you contact those sites directly for information about their data practices and policies, and we encourage you to read their privacy policies before providing any information to them.

## Do Not Track Signals

Our Website currently does not respond to “Do Not Track” (“DNT”) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

## Children’s Privacy

This Website is not intended for children or minors under the age of 18. We do not knowingly collect personal information from, or market to, children under the age of 18. If we become aware that a child under the age of 18 has provided us with personal information, we will take steps to comply with applicable legal requirements to remove such information.

## Questions about this Policy

If you have any questions or concerns about this Policy, you can contact us at:

Altro  
support@altro.io  
+1 (833) 602-5876

The following Privacy Notice applies if you request or receive a financial product or service through Altro.

**FACTS**

**WHAT DOES ALTRO, INC. 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ <b>Social Security Number</b> and <b>Purchase History</b></li> <li>▪ <b>Account Balances</b> and <b>Transaction History</b></li> <li>▪ <b>Payment History</b> and <b>Wire Transfer Instructions</b></li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share <b>customers</b> personal information to run their everyday business. In the section below, we list the reasons financial companies can share their <b>customers</b> personal information; the reasons <b>Altro</b> chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Altro 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	YES	NO
<b>For joint marketing with other financial companies</b>	YES	NO
<b>For our affiliates’ everyday business purposes –</b> information about your transactions and experiences	NO	We don’t share
<b>For our affiliates’ everyday business purposes –</b> information about your creditworthiness	NO	We don’t share
<b>For our affiliates to market to you</b>	NO	We don’t share
<b>For nonaffiliates to market to you</b>	NO	We don’t share

Questions?	Call: 1 (833) 602-5876 or Email: <a href="mailto:support@altro.io">support@altro.io</a>
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What we do	
<b>How does ALTRO 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 ALTRO collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ <b>Open an account</b> or <b>Give us your contact information</b></li> <li>▪ <b>Provide account information</b> or <b>Seek financial or tax advice</b></li> <li>▪ <b>Give us your income information</b></li> </ul> <p>We also collect your personal information from other companies.</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> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Altro, Inc. has no affiliates.</i></p>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Altro, Inc. does not share with nonaffiliates so they can market to you.</i></p>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Our joint marketing partners include banks and credit card companies.</i></p>