



# Happy Mango

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Privacy Policy



**Last Updated:** July 31, 2019

Welcome to Happy Mango. Your privacy is important to us.

This Privacy Policy covers how we collect, use, disclose, transfer, and store information that we receive when you use our Services (as defined below), including those who access some of our website content but do not have accounts (“Visitors”) and those who have subscribed to the Service (“Members”). This Privacy Policy applies only to those websites, services, and applications included within our Services and does not apply to any third-party websites, services or applications, even if they are accessible through our Services. Also, please note that, unless otherwise stated in this Privacy Policy, words used in this Privacy Policy have the same meanings as in our Terms of Service.

By using the Services, you agree to this Privacy Policy and the processing of your data, including your personal information, in the manner provided in this Privacy Policy. If you do not agree to these terms, please do not use the Services.

Happy Mango is an Internet-based website and mobile application (“app”) that, with your permission, aggregates financial information about you (interchangeably, with and without others, either separately or collectively, “you” or “user”) to generate a financial assessment about you (“Financial Profile”). Happy Mango, with your permission, then shares your Financial Profile and connects you with third-party financial institutions (all of the foregoing, the “Services”).

This Privacy Policy (as amended from time to time, “Policy”) describes to you how and when Happy Mango Inc. (d/b/a Happy Mango or [www.happymangocredit.com](http://www.happymangocredit.com), and all subdomains) (“Happy Mango” “we,” “our,” or “us”) obtains, retains, discloses, transfers, disseminates, analyzes, and otherwise uses (“collect(s)”) information from you and others about you, and how we utilize or share such information. For example, we may collect such information when you use the Services through our website, our app, or another source, or when you contact us directly, such as by email, SMS (text messaging), or other form of contact or communication with us, or when third-parties provide us with information about you. Please note that, if you provide us with your telephone number, you agree to us sending you text notifications and understand that data usage rates may apply (to which you consent). By using the Services, you consent to us collecting your information as set forth in this Policy and in connection with the Services (as we provide them from time to time, which may differ at any time from the Services that we provide when you create, edit, or modify your account).



## Information we collect from you

### Basic account information

When you create or modify an account with us we may ask you to provide to us certain personally identifiable information (“*PII*”), such as your name (although pseudonyms are allowed), an email address, a password for your account, and we may also ask for your telephone number (separately or collectively, “*Basic Account Information*”). You may edit your Basic Account Information at any time.

### Additional information that you provide

In addition to Basic Account Information, we collect other information, depending on the specific needs and requirements for the services that we provide you. For example, you may upload certain documents, such as a picture of a utility bill, for purposes of applying for a loan at one of the lenders on the Happy Mango platform. Also, if you contact us via email or contact us in any other way, we may collect the information that you send us or share with us in connection with such communication.

### Information collected on behalf of partners to provide Services

We collect additional personally identifiable information on behalf of our partners, for example we will ask for social security number when applying for a loan from a partner financial institution.

### Automatically collected information

When you use the Services, we automatically collect some information, such as the following (some of which may be the same or similar to Basic Account Information or additional information that we previously collected):

- *Device Information:* Information about your computer, mobile, or other device, including its model number, operating system and version, mobile carrier, telephone number, browser type and language, and any unique device identifiers, such as the devices’ MAC address or IMEI.
- *Location Information:* With your consent, information about your location by using data from the device you use for the Services, such as precise location information from GPS enabled on your smartphone, information about wireless networks or cell towers near your device, or the Internet Protocol (IP) address of your device(s).
- *Cookies and Other Tracking Technologies:* We use cookies and similar technologies, such as web beacons, to collect additional Services usage data, such as to track how users engage with or otherwise use the Services. We may use both session cookies and persistent cookies to better understand how you interact with the Services, to monitor aggregate usage by users (and, perhaps, users of other service providers) and web traffic routing in connection with our Services. Most Internet browsers automatically accept cookies. Although you can change your web browser settings and instruct it to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit, some of the Services may not function properly if you disable cookies.
- *Usage:* We analyze your use of the Services, such as the time, date, and location of your



- use, and the third-party financial institutions with which you connect through the Services.
- *Log Data:* When you use and interact with the Services, we may receive and record information such as your IP address, browser type, operating system, browser history, location, mobile carrier, device information (including device and application IDs), search terms, and cookie information. We may also receive this information when you click on, view or interact with links on our Services, including links to third-party websites or applications, or when you receive email notifications from us.

## Information we collect from other sources

We may collect information about you that we obtain from other third parties. For example, if you link your Happy Mango account by using the “add account” feature of the Services with one or more of your accounts with another service or financial institution (for example, Bank of America to link your checking account), we may receive information about you from that other service or institution. We may then combine any or all of this information with other information that we have collected from you or from other third parties. We may also collect information from financial institutions with which our Services are used or integrated (which such use or integration is with your permission), including tracking data concerning their use of the Services. We will not, however, retain your credit card or your personal banking information.

## Third-Party applications that collect your information through Happy Mango

### Google Analytics

Happy Mango uses a tool called “Google Analytics” to collect information about use of this site. Google Analytics uses “cookies,” which are small text files placed on your computer to collect standard internet log information and behavior information in an *anonymous* form. These cookies could collect information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. Happy Mango uses the information we get from Google Analytics only to improve this site, by sending cookie information to Google to process and compile statistical reports on website activity. Google Analytics collects only the IP address assigned to you on the date you visit this website or app. It does not collect your name or other identifying information. Happy Mango does not combine the information it gets through Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the website or app, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by [disabling cookies](#) on your browser.

### Plaid

We use Plaid, an API for banking data that allows us to integrate with the infrastructure of various banks. When using Plaid, you provide your account information directly to Plaid. The account information you enter does not go through Happy Mango’s server. In compliance with Plaid’s policies, we are providing a link to Plaid’s privacy policy: <https://plaid.com/legal/#Privacy-Policy>.



As directed by Plaid, we state that each end user acknowledges and agrees that information will be treated in accordance with Plaid's policy. You are notified and agree to Plaid's policy prior to using our Services in a way that uses Plaid's service. In addition, you grant Plaid the right, power and authority to access and transmit the data on your behalf as reasonably necessary for Plaid to provide its services.

## Dwolla

In order to use the payment functionality of our application as related to the disbursement and repayment of a loan, you must open a "Dwolla Platform" account provided by Dwolla, Inc. and you must accept the [Dwolla Terms of Service](#) and [Privacy Policy](#). You authorize us to collect and share with our payments provider Dwolla, Inc. your personal information including full name, date of birth, social security number, physical address, email address and financial information, and you are responsible for the accuracy and completeness of that data.

## What we do with the information that we collect

After we obtain information about you, here is what we do with it:

- We do NOT sell, rent, or trade your personal information (such as your Financial Profile) with any other party (including third-party financial institutions) without your permission and consent or as otherwise required by law.
- We may use your information to learn about your use of the Services so that we try to improve the features and functions of the Services.
- We may contact you to send you periodic messages, updates, or notifications regarding the Services or this Policy.
- We may monitor and analyze trends and usage, and make inferences regarding the Services.
- We may provide you with custom content within the interface of the Services, which may include something such as a summary of your financial profile.
- We may use your information to help prevent spam, fraud, or abuse by users of the Services.
- We may use your information to provide to financial or research institutions with which we have a relationship certain aggregated data (that will not personally identify you) regarding our users' use of the Services as such use pertains specifically to such financial institution to help it better manage its use of our Services.
- We may use your information in a way that will not personally identify you to forecast trends, using algorithms or other methodologies, such as the success rate of certain Financial Profiles in obtaining loans or credit from the financial institutions with whom we connect you with.



## How we share your information

### Third Parties

We have business relationships with various third parties that help us provide and improve the Services. We may share your information with those third parties as follows:

- *Financial Institutions:* As part of the Services we provide the opportunity to connect you with financial institutions in order for you to obtain a loan, credit, or other financing. In this regard, with your permission, we may share your Financial Profile with such financial institutions. We may also share certain aggregated information with them, such as the number of users of the Services, general demographic information (i.e., age and gender) about you, and other characteristics of all of our users (for instance, aggregated FICO scores, household income, employment type), and other information relating to the use of the Services. Any such aggregated information will be compiled with other users' aggregated data such that it does not personally identify you.
- *Financial Counselors and Coaches:* As part of the Services we provide the opportunity to connect you with a professional financial counselor or coach in order for you to obtain advice or guidance that help you achieve your personal financial goals. In this regard, with your permission, we may share your Financial Profile with such counselors and coaches. We may also share certain aggregated information with them, such as the number of users of the Services, general demographic information (i.e., age and gender) about you, and other characteristics of all of our users (for instance, aggregated FICO scores, household income, employment type), and other information relating to the use of the Services. Any such aggregated information will be compiled with other users' aggregated data such that it does not personally identify you.
- *Service Providers:* We engage technical service providers to perform functions and provide services to us related to the Services, such as information technology. These providers with access to your information are required to read and follow Happy Mango data security and privacy policies. These providers must agree to and sign a Non-Disclosure Agreement before initiating their services.
- *Your Consent:* We may receive information from third parties with your information with your consent, such as when you authorize a third-party service provider or application to access your Services account, for example by allowing a financial counselor or financial coach to provide information to us. We may allow others to view certain information about you as well, such as when you authorize a financial counselor or coach to access to your financial profile.

### Law and Harm

Notwithstanding anything to the contrary in this Policy, we may collect your information if we believe that it becomes reasonably necessary to comply with any law, regulation, legal process, or governmental request for any of the following purposes: to protect the safety of any person; to address fraud, security or technical issues; or to protect Happy Mango's rights or business interests. However, this is not intended to limit any legal defenses or objections that you may have to prevent us from taking such actions with respect to your information for such purposes.



## **Business Transfers**

If we are a party to a bankruptcy, merger, acquisition, reorganization, or sale of all or substantially all of our assets, your information may be transferred as part of that transaction. This Policy will continue apply to your information transferred to the transferee, be subject to any subsequently permissible changes, revisions, or amendments.

## **Information retention**

Your information is not automatically deleted. If you close your account or, we will delete personally identifiable information we collected through your use of the Services, including your Basic Account Information. You may request to close your account by emailing us at [support@happymangocredit.com](mailto:support@happymangocredit.com). Please allow us approximately 24 hours to comply with your request. However, please note that your information may be retained on a data backup. Further, your information may be deleted automatically after an extended time during which you do not use the Services.

## **Security**

Happy Mango will work to maintain the security and integrity of the information that we collect, including your PII. We have a separate Information Security Policy and Guidelines available upon request at <https://www.happymangocredit.com/security>. This includes a Password Policy, Encryption Policy, Patching Policy, Software Release Policy,

and Backup Policy. We use several physical and electronic safeguards to keep your information safe. We use the strongest available browser encryption, store all of our data on servers in secure facilities, and implement systematic processes and procedures for securing and storing data, including strong password requirements and hashing and salting of stored passwords. We limit access to your personal and financial information to only those employees with authorized access, and we require third parties who perform services for Happy Mango agree to keep your information confidential. In the event you choose to close your account or if your account is terminated with us, we will continue to adhere to the policies and practices outlined here. However, due to the inherent risk of data breaches, we are unable to guarantee the security of your information.

## **Links to other websites are excluded from this privacy policy**

In connection with the Services, we provide you with links to or may connect you with other companies and financial institutions with which we have a business relationship. Any information that you provide to any such other company or institution, or information that is collected by that other company or institution, is not subject to this Policy (except as otherwise explicitly stated in this Policy). Accordingly, we recommend you carefully review the privacy policy for any company or institution that is linked to or connected from the Services (or with which you interact during any use of the Services).



## **Do-Not-Track**

Happy Mango does not respond to “do-not-track” signals at this time. The Services will function even if “do-not-track” is enabled on the device being used for the Services. Accordingly, the website and app continue to track your use of the Services.

## **Policy towards minors**

Our Services are not available or directed to any person under 18 years old, and we will not intentionally collect any information about anyone under 18 years old. In the event that we are notified or become aware that we have information on someone under 18 years old, we will take reasonably diligent efforts to delete the information as well as any account that was created using the information. If you are aware or believe that we have collected information from someone under 18 years old, please notify us by emailing – [support@happymangocredit.com](mailto:support@happymangocredit.com).

## **International Visitors**

The Services are hosted in the United States. If you are an international visitor, you should note that by providing your personal information, you are: (i) permitting the transfer of your personal information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal information in accordance with this Policy.

## **Changes to This Policy**

We may change (or otherwise revise or amend) this Policy from time to time on and after the Effective Date. The current version of the Policy will govern our use of your information and is available for you to download and review at <https://www.happymangocredit.com/privacy>. If we change this Policy in any manner that we (in our sole discretion) determine is material, we will notify you by posting or publishing the new policy on our website or via an update on our web or mobile app, or via SMS or email to the email address associated with your account. By continuing to access or use the Services after any changes become effective, you agree to be bound by the revised Policy.

## **Questions and Comments**

If you have any questions, comments, suggestions, or feedback regarding this policy, we encourage you to email us at: [support@happymangocredit.com](mailto:support@happymangocredit.com).

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