



Odola Privacy Notice

Last Updated: July 8th 2026

This Privacy Notice describes how Odola Inc. ("Odola," "we," "us," or "our") collects, uses, shares, and protects information about you when you use our website, mobile application, and the financial services made available through them (collectively, the "Services").

This Privacy Notice applies to applicants, customers, users of the Services, and former customers. When you are no longer our customer, we continue to share your information as described in this Privacy Notice.

This Privacy Notice does not cover information collected by Lead Bank in its capacity as sponsor bank for your account, issuer of your debit card, and, where applicable, sponsor bank for international money transfer services. Lead Bank's separate Privacy Notice is provided at account opening and made available through the App or on our website, where available.

1. About this Privacy Notice

1.1 Who is responsible for your information?

For most information collected through the Services, Odola Inc. determines how the information is collected, used, shared, and protected. Where information relates specifically to your Lead Bank account or debit card account, Lead Bank may also determine how that information is collected, used, shared, and protected, and that information is governed by Lead Bank's Privacy Notice.

Odola and Lead Bank may exchange information as necessary to provide the Services, comply with law, manage risk, detect and prevent fraud, and satisfy regulatory and sponsor-bank program requirements.

1.2 When and how we provide this Privacy Notice

We provide this Privacy Notice during account creation or onboarding for the Services and make it available on our website and in the App. Where required by law, we provide annual privacy notices while you remain a customer. We will provide a revised notice before we make material changes to how we share or protect your information, where required by law.

1.3 How we protect your information

To protect your personal information from unauthorized access and use, we use administrative, technical, and physical safeguards that comply with federal law. These safeguards include encryption in transit and at rest, multi-factor authentication for access to systems holding nonpublic personal information, role-based access controls, vendor due diligence, logging and monitoring, employee

training, and incident-response procedures. We require service providers that handle personal information for us to maintain appropriate safeguards. No security program is perfect, and we cannot guarantee the absolute security of your information.

2. Key Terms

- (a) "Affiliates" are companies related to Odola by common ownership or control, including Odola group companies where applicable.
- (b) "Non-affiliates" are companies not related to Odola by common ownership or control. Odola does not share your information with non-affiliates for their own marketing purposes.
- (c) "Joint marketing" is a formal agreement between non-affiliated financial companies that together market financial products or services to you. Odola does not engage in joint marketing as of the date of this Privacy Notice.
- (d) "Personal information" includes nonpublic personal information under the Gramm-Leach-Bliley Act and Regulation P and other information that identifies, relates to, describes, or can reasonably be associated with you or your household, as applicable under law.

3. Information We Collect

We may collect the following categories of information about you:

- (a) Identification information: name, date of birth, Social Security Number, government-issued identification numbers, photograph, and biometric identifiers used for identity verification. Where required by law, we obtain your consent before collecting or using biometric identifiers.
- (b) Contact information: residential address, mailing address, email address, and phone number.
- (c) Financial information: account balances, transactions, transfers, source of funds, employment information, income information, and external account information you choose to link to your Account.
- (d) Recipient information: when you initiate an international money transfer, information about the recipient, such as name, address, bank account or wallet details, and your relationship to the recipient.
- (e) Device and technical information: device identifiers, IP addresses, operating system version, App version, browser type, time zone, log data, diagnostic data, and similar technical information.
- (f) Location information: approximate location based on IP address and, where you grant permission, precise location from your device.
- (g) Communications: messages and recordings of communications you have with us, including chat, email, and phone calls, which we may record for training, quality assurance, compliance, and dispute-resolution purposes.

- (h) Information from third parties: information from identity-verification, fraud-prevention, sanctions-screening, politically exposed person screening, adverse-media screening, and credit-bureau service providers; information from your wireless carrier used to identify you and prevent fraud; and information from public and commercial sources.

4. How We Collect Your Information

We collect information directly from you when you open an Account, provide identification information, conduct transactions through our Services, communicate with us, or use our website or mobile application. We also collect information automatically through cookies, software development kits, logs, and similar technologies, and from third parties such as identity-verification providers, government databases, credit bureaus, fraud-prevention providers, sanctions-screening providers, your wireless carrier, and other public or commercial sources.

5. How We Use Your Information

We use your information to:

- (a) provide and operate the Services, including opening and maintaining your Account, processing transactions, providing debit-card and money-transfer functionality, and providing customer support;
- (b) verify your identity and eligibility, authenticate you, and prevent fraud, unauthorized transactions, and other misuse of the Services;
- (c) comply with our legal and regulatory obligations, including the Bank Secrecy Act, the USA PATRIOT Act, OFAC sanctions requirements, the Fair Credit Reporting Act, state money-transmission and consumer-protection laws, and sponsor-bank program requirements;
- (d) communicate with you about your Account, transactions, notices, updates, security alerts, and the Services;
- (e) send you information about Odola products, services, features, and offers, subject to your marketing preferences and applicable law;
- (f) improve the Services, test and develop new features, debug issues, conduct analytics, and understand how the Services are used;
- (g) protect the security, availability, and integrity of the Services, our systems, our customers, and our partners; and
- (h) enforce the Account Agreement, Terms of Use, Cardholder Agreement, and other applicable terms and policies.

6. How We Share Your Information

We share your information only as permitted or required by law and only with the categories of recipients identified below. We do not sell your personal information for monetary consideration, and we do not share your information with non-affiliated third parties for those parties' own marketing purposes.

Categories of information disclosed. We may disclose any of the categories of information listed in Section 3 to the categories of recipients listed in this Section 6 when disclosure is permitted or required by law and reasonably necessary for the purposes described in this Privacy Notice.

- (a) Lead Bank, as sponsor bank for your account, issuer of your debit card, and, where applicable, sponsor bank for international money transfer services. Sharing supports onboarding, ongoing due diligence, transaction processing and settlement, fraud and anti-money-laundering monitoring, disputes, customer support, regulatory reporting, and our respective legal, regulatory, and sponsor-bank program obligations.
- (b) Service providers that perform services on our behalf, including identity-verification providers; sanctions, politically exposed person, and adverse-media screening providers; fraud-prevention and transaction-monitoring providers; the card issuer-processor; cross-border payout partners; cloud-hosting providers; analytics and diagnostics providers; customer-support platforms; transactional email, SMS, and communications providers; and legal, audit, compliance, accounting, and tax advisors.
- (c) Card networks, payment networks, payment processors, and other transaction participants, including Visa and the card issuer-processor, in connection with card, payment, transfer, refund, chargeback, dispute, settlement, and reconciliation activity.
- (d) Federal and state regulators, supervisory authorities, law-enforcement agencies, courts, and other government bodies in response to subpoenas, court orders, examination requests, lawful requests, required reports, and other legal or regulatory obligations, including obligations under Bank Secrecy Act and OFAC programs.
- (e) Non-affiliated third parties under exceptions to consumer opt-out rights set out in 15 U.S.C. § 6802(b)(2) and (e), including sharing necessary to effect, administer, or enforce a transaction you request or authorize; protect against or prevent fraud, unauthorized transactions, claims, or other liability; comply with federal, state, or local laws and legal process; and facilitate a proposed or actual sale, merger, transfer, financing, reorganization, bankruptcy, or other transaction involving all or part of our business.
- (f) Successors in interest in connection with a merger, acquisition, financing, reorganization, bankruptcy, or sale of all or part of our business or assets.
- (g) Other third parties when you direct us to share the information, authorize the sharing, or provide consent.
- (h) Financial Institutions: Odola uses Plaid Inc. ("Plaid") to gather your data from financial institutions. By using the Service, you grant Odola the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You

agree to your personal and financial information being transferred, stored, and processed by Plaid. Odola Visa™ debit cards are issued by Lead Bank. Odola also uses financial institutions to process your ACH funds transfers from your funding source bank account to Odola for use of the Service.

Recipients that process information on our behalf are required by contract to use the information only to provide services to us or for other purposes permitted by law and to maintain appropriate safeguards.

FedNow instant payments. When you receive payments through the FedNow Service, transaction records and related information (such as payment details, identifiers, and timestamps) may be used and disclosed by Odola, Lead Bank, and the Federal Reserve Banks to operate, maintain, and improve the FedNow Service, including related directory, risk, compliance, and fraud-prevention services. We also collect, use, retain, and share fraud-related data about FedNow activity, such as device and behavioral signals, internal risk scores, and case-management notes, with Lead Bank and the Federal Reserve Banks to detect, investigate, and prevent fraud and to meet FedNow fraud-reporting expectations. By using services that support FedNow payments, you authorize this use and sharing, consistent with this Privacy Notice and applicable law.

7. GLBA Notice: Your Rights to Limit Sharing

All financial companies need to share customers' personal information to run their everyday business. The table below lists the reasons financial companies can share their customers' personal information, whether Odola shares for each reason, and whether you can limit this sharing.

Reasons we can share your personal information	Does Odola share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus, or comply with law	Yes	No
For our marketing purposes — to offer Odola 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 non-affiliates to market to you	No	We don't share

Federal law gives you the right to limit only sharing for affiliates' everyday business purposes involving information about your creditworthiness, affiliates from using your information to market to you, and sharing for non-affiliates to market to you. As of the date of this Privacy Notice, Odola does not share information in any category that triggers a GLBA or FCRA sharing opt-out right. If our practices change, we will provide a revised notice and any required opportunity to opt out before the new sharing begins.

Marketing communications preferences are separate from GLBA and FCRA sharing opt-out rights. You may opt out of marketing communications as described in Section 8.

8. Your Privacy Choices

- (a) Marketing communications. You can opt out of marketing communications at any time by following the unsubscribe instructions in our marketing emails, changing your preferences in the App where available, or contacting us. Even if you opt out of marketing communications, we may still send transactional, service, account, security, legal, or other non-marketing communications.
- (b) Account information. You can review and update most of your Account information through the App. We may ask you to verify your identity before we make certain changes.
- (c) Cookies and similar technologies. You can manage cookies and similar technologies through your device or browser settings. Disabling certain technologies may affect website or App functionality.
- (d) Device permissions. You can manage precise location, camera, contacts, notifications, and similar device permissions through your device settings. If you disable permissions needed for a feature, that feature may not work.
- (e) State privacy rights. Depending on the state in which you reside and the type of information involved, you may have additional rights regarding your personal information. See Section 9.

9. State-Specific Privacy Rights

Many state privacy laws exempt personal information that is subject to the Gramm-Leach-Bliley Act. Where a state privacy law applies to personal information we maintain that is not subject to a GLBA exemption, residents of certain states may have some or all of the following rights, subject to legal exceptions and verification requirements:

- the right to know, confirm, or access the personal information we process about you;
- the right to obtain a portable copy of certain personal information;
- the right to delete personal information, subject to legal exceptions;
- the right to correct inaccurate personal information;
- the right to opt out of the sale of personal information or sharing for cross-context behavioral advertising, where applicable;
- the right to limit the use or disclosure of sensitive personal information, where applicable;
- the right to appeal certain decisions we make about your privacy request, where applicable; and

- the right not to be discriminated against for exercising privacy rights.

California residents. If you are a California resident, the rights above apply to personal information we maintain that is not subject to the GLBA exemption or another applicable exemption. We do not sell personal information for monetary consideration. If any use of cookies, analytics, or similar technologies is considered a sale or sharing under applicable law, you may exercise opt-out rights by contacting us or by using any in-product or website mechanism we make available.

To exercise a state privacy right, contact us at privacy@odola.com or use any privacy request mechanism we make available in the App or on our website. We may need to verify your identity and authority before responding. We may decline or limit a request when an exception applies, including where information must be retained for compliance, fraud prevention, security, transaction processing, dispute resolution, legal claims, or other permitted purposes.

10. Data Retention

We retain your information for as long as your Account is open and for at least five (5) years after your Account is closed, or longer where required or permitted by law. For example, the Bank Secrecy Act requires retention of certain records for at least five years. We may also retain information as needed for fraud prevention, security, dispute resolution, regulatory examination, litigation, audit, tax, accounting, and other legitimate business or legal purposes.

11. Children's Privacy

The Services are intended for users 18 and older. We do not knowingly collect personal information from children under 13. If we learn that we have collected personal information from a child under 13, we will delete it promptly, unless we are legally required to retain it.

12. International Transfers

The Services are operated from the United States. If you access the Services from outside the United States or if a service provider processes information outside the United States, your information may be transferred to and processed in the United States or other jurisdictions. Those jurisdictions may have data protection laws that differ from the laws where you reside.

13. Changes to this Privacy Notice

We may update this Privacy Notice from time to time. We will post the updated Privacy Notice in the App and on our website. Where an update materially affects how we use, share, or protect your information, we will provide advance notice through the App, by email, or by another method permitted by law, where required.

14. Contact Us

Privacy questions, requests, and complaints may be directed to:

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