Privacy Policy

(Version 2.0)

Introduction

N26 INC. ("N26") reserves the right to change this Online Privacy Policy from time to time at its sole discretion and without sending notice to you, so you should review this Online Privacy Policy periodically. The effective date of this notice and any revised or changed notice may be found on this page, on the bottom left hand corner of the notice. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

Privacy; Confidential Information

N26’s policy is to protect the confidentiality of the individually identifiable information that you provide, and we limit access to that information only to those with a need to know. N26 collects the “Computer Information” defined below from you: In addition, if you choose to complete certain forms or send us requests, you will be asked to provide the following information:

- Your name, address, phone, email and other contact details and similar information;
- Your age and occupation;
- Your Social Security Number/ Individual Taxpayer Identification Number;
- Financial information (for example, information about your income and your full bank account numbers);
- Documents to verify your identity, occupation and income, such as photographs or copies of government IDs, checks, tax documents and other similar materials; and
- Other personal information that you disclose as part of any Product enrollment, Account application, loan application or in other communications with us.
If you choose to apply to become a customer, the Axos Bank® Privacy Notice will apply and take precedence over any conflicting terms in the Online Privacy Policy.

N26’s policy is to prohibit the unlawful disclosure of your individually identifiable information. N26 will not release your name or otherwise publicize the fact that you purchased services or other information to us unless: (a) you grant N26 permission to do so; or (b) N26 is requested or required to do so by law. To learn more about how N26 protects your individually identifiable information, such as your name and address, please Contact Us.

Marketing List

N26 encourages all users of this Site to register for the mailing list, so that you can receive the latest information on new products and services from N26. You may unsubscribe at any time by sending an email to optout-us@n26.com.

Computer Information

N26 logs your current Internet address (this is usually a temporary address assigned by your Internet service provider when you log in), the type of operating system you are using, and the type of browser software used. In addition, N26 may keep track of what portions of this Site you are visiting. N26 aggregates this information to help N26 improve or create a better experience for users of the Site. For example: N26 may upgrade those parts of the Site that are heavily visited.

Our website automatically records website usage information that we analyze statistically to track operational problems, to prevent fraud and to improve the effectiveness, security and integrity of the site. We do not use this information to track or record information about individuals. We will disclose this information to third parties only in aggregate form or as may be required by law.

In addition to any individually identifiable information or other information that you choose to submit to the Site, we and our third party service providers may use a variety of technologies that automatically or passively collect certain information whenever you visit or interact with the Site (“Usage Information”). Usage Information may include the browser and operating system you are using, the URL or advertisement that referred you to our Site, the search terms you entered into a search engine that led you to our Site (if applicable), all of the areas within our Site that you visit, the time of day you visited the Site and Site traffic, among other information. Usage Information also includes the IP address or other unique identifier (“Device Identifier”) for any computer, mobile phone, tablet or other device (any of which are referred to herein as a “Device”) used to access the Site. A Device Identifier is a number that is automatically assigned to your Device, and our servers identify your Device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the Device used to access the Site.

We may use Usage Information for a variety of purposes, including enhancing or otherwise improving the Site and our products and services. Usage Information is generally non-identifying,
but if we associate it with you as a specific and identifiable person, we treat it as personal information. The methods that may be used to collect Usage Information include the following:

- **Cookies.** A cookie is a data file placed on a Device when it is used to visit the Site or otherwise access our online content. Cookies may be used for many purposes, including, without limitation, remembering you and your preferences and tracking your visits to our web pages. If you choose to disable cookies on your Device, some features of the Site or our content may not function properly.

- **Web Beacons.** Small graphic images or other web programming code called web beacons (also known as “1x1 GIFs” or “clear GIFs”) may be included in our web pages and e-mail messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Site, to monitor how users navigate the Site, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about your interactions with the Site, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Site, and is deactivated or deleted thereafter.

For the purpose of enabling better website design and a better user experience, we employ Google Analytics (a web service by Google, Inc.) to track site traffic and provide aggregate reports of how the public interacts with our website. Session cookies are employed by Google Analytics in the form of client-side JavaScript code. In utilizing this analytics service, N26 maintains its existing standards in regards to the sharing and disclosure of information, security and privacy safeguards for the data, and the data retention policy, each described below. Google Analytics analyzes website usage information automatically upon visits to the N26 website(s). Users who do not wish to have their visit information collected by Google Analytics may opt-out by downloading a browser extension or by disabling cookies in their browser settings. Opting-out of web measurements will still permit users to access the full N26 website, with all included information and functionality.

**Individually identifiable information**

The preceding paragraphs describe the categories of individually identifiable information that N26 collects in this Site. Given the limited information collected and the form in which N26 receives it, N26 does not offer a process for review and changes to individually identifiable information.

N26 may disclose individually identifiable information you provide to third parties if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) complete the transaction, such as providing your shipping information to our carrier; (b) comply with legal process; (c) enforce these Terms of Use; (d) respond to claims that any
information you provide violates the rights of third parties; (e) protect the rights, property, or personal safety of N26, its users and/or the public; or (f) in relation to the sale, assignment, transfer or acquisition of all or substantially all of N26’s assets or shares by a third party. Except as provided in the preceding sentence, N26 will NOT sell or trade your individually identifiable information with third parties, such as sellers of goods or services.

If you wish to change individually identifiable information that you have provided N26, please Contact Us.

Tracking

N26 will not respond to Web browser “do not track” signals. If you would like additional information about online tracking and various opt-out mechanisms, please see http://donottrack.us/

Because we link to social media sites, and from time to time may include third-party advertisements, other parties may collect your individually identifiable information about your online activities over time and across different web sites when you visit this Site.

In addition, we use Google AdWords, so we are advertising the Site online through a form of tracking called remarketing. Third-party vendors, including Google, show our ads on various sites across the Internet, and use cookies to serve you ads based on your past visits to this Site. You can opt out of Google’s use of cookies by visiting Google’s Ads Settings https://www.google.com/settings/ads/plugin. Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page. http://www.networkadvertising.org/choices/

Please note that not all tracking will stop even if you delete cookies.

Encryption

N26 uses no encryption (data scrambling) on certain portions of the Site, but uses encryption on portions where you are transmitting financial information. When you are on any web site that asks you for confidential information, you should check to see if the information being transmitted is encrypted in order to increase the security of your information. Keep in mind that there is no such thing as perfect security.

Children and Minors.

N26 makes no active effort to collect or retain individually identifiable information from children or minors under the age of 18 and does not wish to receive any such information.

Additional Rights:

Applicable laws may give you additional rights that are not described in this Online Privacy Policy.
For further information on Privacy matters contact legal-us@n26.com.

Effective Date: June 20, 2019