

## Privacy Policy

**Effective Date: March 4, 2025**

### **Our Policy:**

Welcome to Valor! Valor US inc., doing business as Valor (“Valor”, “we”, “us”, or “our”), operates the website (<https://www.joinvalor.com>) (the “Site”), our iOS and Android mobile applications, and related services (collectively, the “Services”) for our users (“you” or “your”). This Privacy Policy outlines how Valor collects, uses, and shares personal data (including as defined under privacy and consumer data protection laws in various states) (collectively, “Personal Data”).

By using the Services, you agree to the terms of this Privacy Policy. If you do not agree with these terms, please do not use the Services.

Your access to and use of the Services is also subject to the Terms of Service, which may be updated by Valor from time to time.

**Our Services are intended for individuals in the United States only.** Personal Data provided through the Services may be transferred to the offices and servers of Valor and authorized third parties as outlined in this policy.

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## What Data Do We Collect?

Valor uses data to personalize and improve the offers you see via the Valor app and verify transactions at merchants within the Valor network. Below is a breakdown of the types of data we collect:

- **Location:**  
We use your location to match you with the best nearby offers. This allows us to recommend relevant savings opportunities at local merchants.
- **Military Affiliation Verification:**  
We verify your military affiliation to provide exclusive access to Valor’s platform and benefits. This process ensures that only eligible members of the military community receive the savings and discounts we offer. We use third-party services like SheerID and Quandis for verification purposes.
- **Phone Number:**  
Your phone number is a unique identifier for your account. We use it to communicate with you about processing activities, status updates, promotions, and support inquiries.
- **Transaction Data:**  
We collect transaction data to verify purchases at Valor merchants and personalize recommendations based on your spending habits. This includes the name tied to the account to verify that the card matches the individual whose military affiliation was previously verified. Your account is secured by AES/bank-grade encryption and security. We do not have access to sensitive financial information such as full debit or credit card numbers, expiration dates, or CVV codes. Plaid, our trusted partner, handles the connection

with your bank account securely, and they only provide us with the transaction information necessary to verify your savings.

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## How We Collect Personal Information

We collect information from you when you use the Site or Services, create an account, link your bank account, or engage in transactions at participating Valor merchants.

- **Via Plaid:**  
When you link your bank account or card through Plaid, we receive transaction data to verify purchases made at Valor merchants to apply the appropriate and distribute savings. Plaid does not share your sensitive financial information, such as full debit or credit card numbers, expiration dates, or security codes (CVV). We also cannot access your bank account or your funds. Plaid's role is strictly to verify transactions and provide us with non-sensitive data, such as transaction amounts, dates, and merchant names, necessary to confirm that the card used matches the individual whose military affiliation was verified. Plaid uses bank-grade encryption to protect your data, and we work closely with them to ensure your financial details remain secure. For more information, you can view Plaid's Privacy Policy [here](#).
  - **Direct User Input:**  
When you sign up, provide your military affiliation details, or share location information, we collect and store that information to match you with offers and verify your eligibility.
  - **Cookies and Log Data:**  
We use cookies, log files, and web beacons to collect data automatically when you interact with the Site and Services. These technologies help us improve the user experience and personalize the offers you see. We also use tools like **Posthog** and **Google Analytics** to understand how users interact with our Services, identify bugs, and enhance the platform's performance.
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## How We Use Your Personal Data

Valor uses your Personal Data to:

- **Provide and improve the Services:**  
This includes verifying transactions, calculating savings, and identifying relevant offers that match your preferences and location.
- **Communicate with you:**  
We send you important account notifications, promotional offers, and customer support responses via phone, email, or in-app notifications.
- **Ensure security:**  
We use transaction data and device identifiers to monitor for fraud and ensure your account remains secure.

- **Personalize your experience:**  
Your transaction and location data are used to recommend offers that best suit your needs and maximize your savings.
  - **Maintain account security:**  
We monitor your account for suspicious activity, leveraging device identifiers and transaction histories to keep your information secure.
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## How We Share Personal Data

Valor is not in the business of selling or sharing information that we collect. We consider this information to be a vital part of our relationship with you and the military community.

However, there are certain circumstances in which we may provide your Personal Data to certain third parties without further notice to you, as set forth below:

- **Business Transfers:**  
As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, or similar event, Personal Data may be part of the transferred assets.
- **Agents, Consultants, and Service Providers:**  
Valor, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such third-party providers include data analytics providers (like Posthog and Google Analytics), cloud storage providers, customer service platforms, and security services. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function, and we require them to protect your Personal Data in accordance with this Privacy Policy and applicable law.
- **Legal Requirements:**  
Valor may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to:
  - (i) comply with a legal obligation;
  - (ii) protect and defend the rights or property of Valor;
  - (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public;
  - (iv) protect against legal liability.

**For residents of California, Virginia, Colorado, Connecticut, and Utah**, for the purposes of those states' consumer data protection laws, we do not sell your Personal Data. For residents of California, for the purposes of the California Privacy Rights Act, we do not share your Personal Data. For residents of Virginia, Colorado, Connecticut, and Utah, we do not use your Personal Data to engage in targeted advertising. To the extent that Valor collects Personal Data that constitutes "sensitive personal information" or "sensitive personal data" as defined under state law, Valor limits the use of such Personal Data only to the uses necessary to perform the Services.

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## Your Choices

You can update or delete your account by logging into your profile or contacting us. To request information about your Personal Data, correct it, or delete it, you can:

- Access your account settings on the Valor app.
  - Email us at support@joinvalor.com with the subject line “PRIVACY REQUEST.”
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## Exercising Your Rights Regarding Personal Data

You may request information or changes to your data, including:

- **Information:** You may request information about how we have collected and used your Personal Data.
- **Access:** You may request that we confirm whether we are processing your Personal Data and, if so, provide you with a copy of that data.
- **Correction:** You may request the correction of Personal Data that is inaccurate or outdated.
- **Deletion:** You may request the deletion of Personal Data that we no longer need for lawful purposes.

We will process these requests promptly, but some information may need to be retained to fulfill legal or business obligations. Valor will not discriminate against you for exercising your rights regarding your Personal Data.

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## Children

Valor prohibits the use of the Services by anyone under the age of 13. We do not knowingly collect Personal Data from children. If you believe a child under 13 has provided Personal Data, please contact us immediately, and we will take steps to delete the account and associated information.

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## Security

Valor takes reasonable steps to protect your Personal Data through encryption, firewalls, and secure storage practices. We employ industry-standard security measures to safeguard your information. However, no transmission method over the Internet or electronic storage is 100% secure, and we cannot guarantee absolute security

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## Changes to the Privacy Policy

Valor reserves the right to update or modify this Privacy Policy at any time and from time to time. Any changes will be posted on our Site with a revised “Last Updated” date. Please review the Policy periodically to stay informed of any updates. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Policy.

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## Contacting Valor

If you have any questions about this Privacy Policy or our data practices, you may contact us at:

- **Email:** [support@joinvalor.com](mailto:support@joinvalor.com)

Persons with disabilities may obtain this Privacy Policy in an alternative format upon request by contacting us at [support@joinvalor.com](mailto:support@joinvalor.com).