

General Privacy Policy

Purpose

Evergreen Wealth Corporation and its wholly owned subsidiaries, Evergreen Wealth Advisors Corporation and Evergreen.ai (collectively, “Evergreen,” “we,” “us,” or “our”), take your privacy and data security seriously. As the data controller, Evergreen is responsible for the collection, use, and disclosure of personal information through our websites (www.evergreen.ai and www.evergreenwealth.com, the “Website”) and our products and services, including any mobile or web-based applications such as Evergreen.ai (collectively with the Website, the “Services”). Evergreen.ai is an AI-powered financial advice service offered by Evergreen Wealth Advisors, an SEC-registered investment adviser. Evergreen.ai is not itself a Registered Investment Adviser. It offers general education and calculators, and it may give you personalized advice when you share enough information about your finances. Paid advisory services are provided only by Evergreen Wealth Advisers.

By accessing or using our Services, you acknowledge that you have read, understood, and agree to this Policy and our [Terms of Use](#). If you do not agree, please discontinue use of the Service and uninstall any related applications.

This Policy describes the types of personal information we collect, how we use and disclose it, the measures we take to protect it, your choices, and how to contact us with questions.

Relationship to Client Privacy Notices

This Policy applies to all visitors, users, and clients of our Website and Services, and covers how we collect, use, and disclose personal information in connection with online activity, cookies, analytics, and marketing.

Clients who obtain financial products or services from us also receive additional protections under federal law (e.g., the Gramm-Leach-Bliley Act), described in separate Privacy Notices provided at account opening, annually thereafter, and in our Website’s [Privacy Center](#).

What Does This General Privacy Policy Cover?

This Policy covers personal information we collect when you use the Service, including information disclosed with us by third parties in connection with the Service.

By using our Services, you authorize us to collect, process, use, and disclose your personal information as described here, including with trusted third-party service providers, for purposes necessary to provide and improve the Service. We require any third-party service provider who handles your personal information on our behalf to protect its security and confidentiality and to use it only as reasonably necessary for their work with us and in compliance with applicable law.

This Policy does not apply to third-party service providers you access or disclose information with directly. We aim to facilitate access only to providers that respect your privacy, but we aren't responsible for their content or privacy practices. We encourage you to review their policies independently.

How We Collect Data

We collect personal information directly from you (e.g., applications, forms, account linking), automatically when you interact with our Services (cookies, system logs, analytics), and from third-party service providers such as fraud detection, identity verification, data, and analytics vendors. The more accurate and complete the information you provide, the more we can tailor your financial guidance and advice to your circumstances.

Categories of Personal Information We Collect

Information you provide:

- Identifiers such as name, address, email, phone, and date of birth.
- Login information associated with your account, including username and password.
- Financial data, including bank account & transaction details, routing/account numbers, income, and investment goals.
- Your transaction history with us.
- Any information shared when contacting customer service, including communications via email or phone.
- Marketing data, including marketing preferences and engagement.

Information we automatically collect:

- Metadata and analytics for your use of our Website and Services, including IP address, device information, date/time of visits, new or returning visits, products viewed, page response times, URL clickstreams, how long you stay on our pages, what you do on those pages.
- We may use cookies, beacons, pixel tags, and other similar technologies to collect additional information automatically as you interact with the Website and Services and to personalize your experience with our Website and Services. Learn more about our cookie use below.
- We may infer your imprecise geolocation based on your IP address.

Information from third parties:

- From time to time, we may obtain information about you from our affiliates, third-party and public database sources such as KYC vendors, government / sanctions websites, as required or permitted by applicable law.
- 'Sensitive' personal information: With your consent, we may collect the following categories of personal information that may be deemed 'sensitive' under certain privacy laws:

- Government identifiers such as social security numbers, drivers' license, or other state identification.
- Biometric data such as facial recognition and voice recognition data derived from photographs or audio you submit to us in real-time sessions. For more information on how we collect, use, disclose, and protect biometric data, see Biometric Data below.
- We may also collect personal information with your consent.

Business Purposes for Collecting Personal Information

We use the personal information we collect for the following purposes:

- To provide and improve our Website and Services (including account setup, service delivery, transaction processing, providing financial guidance/advice, identity verification, and fraud prevention).
- To communicate with you.
- To process payments securely.
- For customer support.
- For marketing or promotional purposes.
- For other business and legal purposes, such as to detect and prevent fraud.
- For any other purpose with your express consent.

How We Disclose Personal Information

We may disclose your information with your consent. We may also disclose your information to our corporate affiliates, as well as vendors or service providers, which includes:

- Service providers who help us communicate with you. For example, we disclose your information to Braze, Inc. who helps us send our email communications and to Aircall.io, Inc. who helps us send our SMS/MMS communications.
- Service providers that facilitate account linking and financial data aggregation, including Plaid Inc.
- Service providers who provide artificial-intelligence powered features. For example, we may disclose your user-generated content to Amazon Bedrock, a hosted AI infrastructure service offered by Amazon Web Services, Inc. The contents of the personal communications will not be used for any purpose other than to support our Services, but are also subject to Amazon Web Services, Inc.'s [service terms](#) and [privacy policy](#).
- Service providers and other third parties who provide identity verification services. For example, we use SardineAI Corp. for identity verification services to identify and authenticate you when you create an account with us or use our Services. The information collected during this process may constitute biometric data, including facial recognition data and mathematical

representations of your facial geometry. For more information on how we collect, use, disclose, and protect biometric data, see Biometric Data below.

- Service providers who manage and optimize our Website and Services with website analytics.
- Businesses, service providers, and third parties that provide marketing and advertising services (see 'Cookies and Tracking Technologies' for more information on your choices with these services).
- Service providers who help us identify anonymous website visitors based on technical signals such as IP address, device information, and cookies. When permitted, this information is matched to known contact records for marketing and analytics purposes. This information is used by us to improve personalization, outreach, and user optimization. You may opt out of this disclosure at any time by using our cookie preference center.

In addition, we may disclose your personal information in order to:

- Protect the legal rights of our company, our employees, our agents, and our affiliates.
- Protect the safety and security of our customers.
- Detect and protect against fraud.
- Comply with law or legal process. For example, in certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet law enforcement requirements or a court order, subpoena, or other judicial, administrative, or investigative proceedings.
- Conduct due diligence or complete a legal transaction related to the sale of our business or any assets. For example, we may disclose your personal information to potential acquirers, mergers, or partners exclusively to evaluate the proposed business transaction or organization change. You will be notified via email and/or a prominent notice on our Website of any change in ownership or materially different uses of your personal information, as well as any choices you may have regarding transfers of your personal information.

We may disclose de-identified, aggregate, or anonymous information for any purpose. This means that the information does not identify specific individuals.

Biometric Data

Evergreen collects and processes information that may be considered "biometric data" under certain laws. If you choose to use our Services, we will process your biometric data as described below.

Biometric data is identifying information derived from your physical characteristics that may be used to identify you. Depending on the Service you use, Evergreen may process your facial geometry and, in certain contexts, your voice characteristics, whether in real time during a session, or during enrollment, identity verification, and account recovery.

Identity Verification & Use of Biometric Data

To fulfill our regulatory compliance obligations, including Know Your Customer (KYC) and anti-money laundering (AML) requirements, and to protect against identity fraud, Evergreen uses third-party identity verification providers to perform biometric identity verification during enrollment and account recovery. This process may include:

- Capture of a real-time selfie or facial image;
- Liveness detection to confirm the presence of a live person and guard against spoofing or synthetic identity fraud;
- Automated facial recognition comparing your facial biometrics against the photograph on your government-issued identification document (such as a driver's license or passport); and
- Document verification to validate the legitimacy and authenticity of your identification document.

Our third-party identity verification providers are expected to maintain appropriate security standards and to process your biometric data only as necessary to deliver identity verification services on our behalf. How these providers handle, retain, and delete biometric data is governed by our agreements with each provider.

Evergreen collects biometric data during registration when additional identity verification is legally required or with your consent. Biometric identity verification is also required for certain Services, such as enrollment or account recovery; if you decline to consent, you may not be able to complete enrollment for those Services.

Session transcripts (text records of a conversation, distinct from biometric data) may be reviewed by Evergreen to enhance our Services and are retained for compliance purposes as described in the Data Retention and Deletion section below.

Security, Disclosure, & Retention

Biometric data is encrypted, transmitted securely, and protected using the safeguards described in "Is Information About Me Secure?" below; we also require our third-party service providers to maintain reasonable security safeguards and to securely destroy biometric data once it is no longer needed for the purpose it was collected.

Evergreen discloses biometric data solely as necessary to deliver the Service:

- We may disclose biometric data to third-party identity verification and fraud prevention providers to perform enrollment verification services on our behalf and expect these providers to use it only for that purpose.
- We do not sell, lease, trade, or otherwise profit from your biometric data.

- We may disclose biometric data where required by applicable state or federal law, municipal ordinance, or pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Biometric data collected solely for session delivery is deleted at the end of each session. Biometric data collected for enrollment and identity verification purposes is retained only for as long as necessary to fulfill those purposes and as required by applicable law. If you would like to request deletion of your biometric data, please contact us as described in the "Contact Us" section below and we will work to fulfill your request consistent with our legal obligations and the capabilities of our service providers.

To confirm deletion of any biometric data or to submit a deletion request, you may contact us at clientservice@evergreen.ai.

Bank Account Information

Registered users of the Service may provide us with access (e.g., permission to link an external account using your account and routing number) that allows us to gain online access to one or more accounts that you maintain with a third-party financial institution and choose to designate for use in connection with the Service (each, an "Authorized Bank Account").

We work with one or more third-party service providers, such as Plaid, that securely store, pursuant to industry standards, any Authorized Bank Account access information you provide, and that access your Authorized Bank Accounts for purposes of providing and improving the Service.

You may only provide account access and authorization for accounts you hold in your own name, not an account held by a third person, and must update your Evergreen account information to reflect any change to the username or password associated with any Authorized Bank Account.

If you choose to link your Authorized Bank Account, you authorize the use of this information to provide you with the Service. This authorization remains in effect until you notify us that you wish to revoke it, which may affect your ability to receive the Service. We never have access to your login information for a third-party bank.

Cookies and Tracking Technologies

We use cookies and similar tracking technologies to operate our Services, for analytics, and for interest-based advertising, which may be considered "sharing" under some state privacy laws. See our Cookie Policy for the categories of cookies we use and how to manage your preferences.

Some marketing cookies enable visitor identification, linking anonymous behavior to known identities via external databases, so we can provide a more relevant experience and prepare personalized responses when you contact us.

Cookies are enabled by default except where applicable law requires otherwise. See our [Cookie Policy](#) for how consent works in your jurisdiction and how to manage your preferences.

Your Privacy Rights

You may have rights under applicable privacy laws to:

- Confirm whether we process your information
- Access and request a copy of your personal information
- Request deletion of your personal information
- Correct inaccuracies in your personal information
- Opt out of certain uses of your personal information, notably:
- Marketing Emails: To opt out of marketing e-mail communications, you may click the 'unsubscribe' link in the marketing emails. We may continue to send you non-commercial service messaging if legally necessary.
- Marketing Text Messages: To opt out of marketing text messages, reply 'STOP' to the text message (or any other legally prescribed response keyword).
- Opt out of the sale or sharing of personal information, except where disclosure is permitted by law or necessary to provide our Services, such as sharing with service providers under contract, for fraud prevention, legal compliance, or account servicing. See our Cookie Policy for how to exercise this right, including via Global Privacy Control.
- Limit the use, processing, or disclosure of sensitive personal information

To exercise these rights, contact us as described in the "Contact Us" section below. Registered users can also view their Account information anytime by logging in and managing cookies through their browser settings.

If you have a joint account, each accountholder may make their own choice, and it applies only to that accountholder unless you tell us otherwise. We will honor your direction as soon as reasonably practicable after we receive it. If we deny your request, you may appeal by emailing clientservice@evergreen.ai with the subject line "Privacy Appeal" and an explanation of your reasons; we will inform you in writing of our response within the time required by applicable law, and if your appeal is denied, you may have the right to contact your state Attorney General.

We will not discriminate against you for exercising your rights under the law.

Children's Privacy

Our Services are not directed to children under the age of 18, and we do not knowingly collect personal information from anyone under the age of 18. If we learn that we have inadvertently collected such information, we will promptly delete it. Consistent with our [Terms of Use](#), our Services are intended for users who are at least 18 years old (19 in Alabama). If you believe a minor has

provided us with personal information, please contact us at clientservice@evergreen.ai so we can take appropriate action.

Data Retention and Deletion

We retain personal information only as long as necessary: to fulfill the purpose it was collected for, meet legal, accounting, or regulatory obligations, establish or defend legal claims, or prevent fraud. Once it's no longer needed, we securely delete or anonymize it in accordance with company policy.

If we change third-party service providers, we may transfer necessary personal information to the new provider so your Services continue uninterrupted.

Is Information About Me Secure?

We take the protection of your personal information seriously. To help prevent unauthorized access and use, we maintain physical, electronic, and procedural safeguards in compliance with applicable law, including, where relevant:

- Physical protections such as secured offices and locked file storage;
- Electronic safeguards including encrypted systems, firewalls, and intrusion detection tools;
- Procedural controls that restrict access to only those employees who need the information to perform their job responsibilities; and
- Vendor requirements that obligate companies working on our behalf to protect your information to standards consistent with our own.

Despite these measures, no system is completely risk-free. Unauthorized access, hardware or software failures, cyberattacks, or other unforeseen events may compromise the security of information at any time. In such cases, we have response procedures in place to act quickly and mitigate potential risks.

Data is processed and stored in the United States and may be processed in other jurisdictions where our third-party service providers operate.

Changes to this General Privacy Policy

We may update this General Privacy Policy from time to time as we update or expand our Website and Services. If we make material changes, we will post the updated General Privacy Policy on this page with a 'Last Updated' effective date of the revisions and will endeavor to alert our email subscribers or Services users in advance of any changes. We encourage you to look for updates and changes to this General Privacy Policy by checking this page when you access our Website and Services.

Contact Us

If you have any questions about our privacy or security practices, or if you would like to submit a privacy request, you can contact us:

- **Online:** via chat at our [Support Center](#)
- **By phone:** (888) 884-0557
- **By email:** clientservice@evergreen.ai
- **In writing:**

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