

PRIVACY POLICY

MJG9 Group LLC

Effective Date: April 22, 2026

This document constitutes the official Privacy Policy of MJG9 Group LLC.

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1. INTRODUCTION & SCOPE

This Privacy Policy describes how MJG9 Group LLC (“Company,” “we,” “us,” or “our”) collects, uses, discloses, and protects information from users (“you” or “your”) of our websites, applications, platforms, and related services (collectively, the “Services”).

This Privacy Policy applies to all users, visitors, and customers who interact with the Services, including, without limitation, those who connect financial accounts through Plaid Link. By accessing or using the Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy.

MJG9 Group LLC is based in the United States. The Services are hosted and operated in the United States, and this Privacy Policy is governed by and construed in accordance with the laws of the United States and applicable state laws. If you access the Services from outside the United States, you do so at your own risk and are responsible for compliance with the laws of your jurisdiction.

2. DATA CATEGORIES COLLECTED

We may collect and process the following categories of information in connection with the Services:

2.1 Personal Identification Information

- Full legal name
- Email address
- Phone number
- Mailing address

2.2 Account & Authentication Data

- Username
- Hashed passwords (we do not store plaintext passwords)
- Account preferences and settings
- Session tokens and authentication credentials

2.3 Financial Data (via Plaid)

The following financial data categories are collected solely through Plaid Link, with explicit user consent:

- Bank account names and numbers
- Routing numbers
- Account balances
- Transaction histories
- Account holder identity information as provided by the financial institution

2.4 Device & Technical Data

- IP address
- Browser type and version
- Operating system
- Device identifiers
- Cookies and similar tracking technologies
- Server log data

2.5 Usage Data

- Pages visited and features used
- Timestamps of activity
- Referral sources
- Interaction patterns and behavioral analytics

3. METHODS OF DATA COLLECTION

We collect information through the following methods:

3.1 Direct User Input

We collect information that you voluntarily provide to us when you register for an account, complete forms, set up your profile, submit customer support inquiries, or otherwise communicate with us through the Services.

3.2 Automated Technologies

We automatically collect certain technical and usage data when you access or use the Services. This includes data collected through cookies, web beacons, analytics tools (such as server-side analytics platforms), and server logs. These technologies allow us to recognize your browser or device, maintain your preferences, and analyze how the Services are used.

3.3 Third-Party Integrations (Plaid Link)

When you choose to connect a financial account through the Services, we use Plaid Link, a service provided by Plaid Inc. The connection process operates as follows:

- You initiate the financial account connection within our Services.
- You authenticate directly with your financial institution through Plaid's secure interface. MJG9 Group LLC does not receive, handle, or have access to your financial institution login credentials.
- You grant explicit consent before any financial data is transmitted from Plaid to MJG9 Group LLC.
- Only the data categories you have authorized are made available to the Services.

4. USE OF PLAID LINK

This section contains important information about how financial data is handled through Plaid Link. Please read it carefully.

4.1 Integration with Plaid

MJG9 Group LLC uses Plaid Inc. (“Plaid”) to connect users’ financial accounts to our Services. Plaid enables secure, user-authorized data exchange between your financial institution and MJG9 Group LLC.

4.2 Plaid’s Privacy Policy

When you connect a financial account through Plaid Link, Plaid’s End User Privacy Policy governs how Plaid collects, uses, and handles your data. You may review Plaid’s End User Privacy Policy at: <https://plaid.com/legal/#end-user-privacy-policy>

4.3 Purpose Limitation

Data accessed through Plaid is used solely for the purposes disclosed to you at the time of connection. MJG9 Group LLC accesses only the minimum data necessary to provide the requested Services. We do not use Plaid-obtained data for purposes beyond those you have expressly authorized.

4.4 No Persistent Storage of Financial Data

MJG9 Group LLC does NOT persistently store raw consumer financial data obtained through Plaid. Financial data retrieved via the Plaid API is used in real-time or cached temporarily for

the duration of the active session and is not written to permanent storage.

4.5 Revoking Plaid Access

You may revoke Plaid's access to your financial accounts at any time through any of the following methods:

- **(a) Plaid Portal:** Visit <https://my.plaid.com> to manage and revoke connections directly through Plaid's user portal.
- **(b) Contact MJG9 Group LLC:** Submit a revocation request by emailing privacy@mjg9group.com. We will process your request and disconnect the Plaid integration associated with your account.
- **(c) Financial Institution:** Contact your financial institution directly to revoke third-party access to your account data.

5. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

- **Service Delivery:** To provide, maintain, operate, and improve the Services, including processing your requests and delivering functionality you have accessed.
- **Transaction Processing:** To process transactions, verify account details, and fulfill service requests initiated by you.
- **Identity Verification & Fraud Prevention:** To verify your identity, detect and prevent fraudulent activity, and protect the security of the Services and our users.

- **Communications:** To communicate with you regarding account activity, service updates, technical notices, security alerts, and customer support responses.
- **Legal Compliance:** To comply with applicable laws, regulations, legal processes, and enforceable governmental requests, and to enforce our Terms of Service and other agreements.
- **Analytics & Improvement:** To conduct analytics, monitor usage trends, and improve user experience, functionality, and performance of the Services.

We do NOT sell personal information to third parties. Under no circumstances does MJG9 Group LLC sell, license, or otherwise monetize your personal data.

6. DATA SHARING & DISCLOSURE

We may share your information with third parties only in the following circumstances:

- **Service Providers:** We engage trusted third-party service providers who assist in operating, maintaining, and improving the Services. These providers are bound by confidentiality agreements and are permitted to use your data only as necessary to perform services on our behalf.
- **Plaid Inc.:** We share data with Plaid solely for the purpose of financial account connectivity, as authorized by you when you initiate

a Plaid Link connection. Plaid's use of your data is governed by Plaid's own privacy policy.

- **Legal Authorities:** We may disclose your information when required by law, subpoena, court order, or other legal process, or when we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others.
- **Business Transfers:** In connection with a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of our assets, your information may be transferred as part of the transaction. In such event, we will provide notice to affected users before personal information is transferred and becomes subject to a different privacy policy.
- **With Your Consent:** We may share your information for any other purpose with your explicit consent.

We do NOT sell, rent, or trade personal information to third parties for their marketing purposes or for any other commercial purpose unrelated to the Services.

7. SECURITY CONTROLS

MJG9 Group LLC implements and maintains administrative, technical, and physical security measures designed to protect your information from unauthorized access, disclosure, alteration, and destruction. These measures include, but are not limited to:

7.1 Encryption

- **Data in Transit:** All data transmitted between your browser or device and our servers is protected using TLS/SSL encryption protocols.
- **Data at Rest:** Sensitive data stored on our systems is encrypted using AES-256 encryption standards.

7.2 Access Controls

- Role-based access controls (RBAC) and least-privilege principles are enforced to ensure that only authorized personnel can access sensitive data.
- Multi-factor authentication (MFA) is required for all administrative and privileged access to our systems.

7.3 Security Assessments

- Regular security assessments, penetration testing, and vulnerability scanning are conducted to identify and remediate potential risks.

7.4 Plaid API Security

- Plaid API credentials (Client ID and Secret) are stored exclusively on backend servers and are never exposed in client-side code, front-end applications, or public repositories.
- Access tokens obtained through the Plaid token exchange process are encrypted at rest.
- Public tokens are destroyed immediately after exchange for access tokens and are never retained.

7.5 Incident Response

- MJG9 Group LLC maintains documented incident response procedures for identifying, containing, and remediating data breaches or security incidents. Affected users will be notified in accordance with applicable law.

8. DATA RETENTION

We retain personal data only as long as necessary to fulfill the purposes described in this Privacy Policy or as required by applicable law. Our retention practices are as follows:

Data Category	Retention Period
Financial Data (via Plaid)	Not persistently stored. Used in real-time or cached temporarily for the duration of the active session only.
Account Data	Retained for the duration of your active account plus three (3) years after account closure, for legal compliance and audit purposes.
Device & Usage Data	Retained for a reasonable period necessary for analytics and security purposes, generally not exceeding twenty-four (24) months.
Anonymized / Aggregated Data	May be retained indefinitely, as such data cannot be used to identify any individual user.

You may request deletion of your personal data at any time by contacting us at privacy@mjg9group.com. Deletion requests are subject to applicable legal retention requirements and will be processed in accordance with Section 9 of this Privacy Policy.

9. USER RIGHTS

Depending on your jurisdiction, you may have the following rights with respect to your personal data:

- **Right to Access:** You may request a copy of the personal data we hold about you. We will provide this information in a commonly used, machine-readable format upon receipt of a verifiable request.
- **Right to Correction:** You may request that we correct or update any inaccurate or incomplete personal data we hold about you.
- **Right to Deletion:** You may request that we delete your personal data (“right to be forgotten”), subject to applicable legal retention obligations.
- **Right to Data Portability:** You may request to receive your personal data in a structured, commonly used, and machine-readable format, and to have that data transmitted to another controller where technically feasible.
- **Right to Restrict Processing:** You may request that we limit the processing of your personal data under certain circumstances, such as when you contest the accuracy of the data.
- **Right to Object:** You may object to the processing of your personal data for certain purposes, including direct marketing or processing based on our legitimate interests.
- **Right to Revoke Consent:** You may withdraw your consent to data processing at any time. This includes the right to revoke Plaid access via the Plaid Portal at <https://my.plaid.com> or by contacting us directly.
- **Right to Non-Discrimination:** You will not receive discriminatory treatment for exercising any of the rights described in this section.

We will not deny you services, charge different prices, or provide a different level of quality based on your exercise of privacy rights.

9.1 How to Exercise Your Rights

To exercise any of the rights described above, please submit a verifiable request to us by emailing: privacy@mjpg9group.com

We will respond to all verifiable requests within **thirty (30) days** of receipt. If additional time is required, we will notify you of the extension and the reasons therefor. We may request additional information to verify your identity before fulfilling a request.

10. CHILDREN’S PRIVACY

The Services are not directed to, and are not intended for use by, individuals under the age of thirteen (13), or under the age of sixteen (16) where applicable under local law. MJG9 Group LLC does not knowingly collect personal information from children under these age thresholds.

If we become aware that we have inadvertently collected personal data from a child under the applicable minimum age, we will take prompt steps to delete such information from our systems. If you believe that we have collected information from a child, please contact us immediately at privacy@mjpg9group.com.

11. CHANGES TO THIS POLICY

MJG9 Group LLC reserves the right to update, modify, or revise this Privacy Policy at any time. When we make changes, we will update the “Effective Date” at the top of this document.

For material changes that significantly affect how we collect, use, or share your personal data, we will provide notice through one or more of the following methods:

- Email notification to the address associated with your account
- A prominent notice displayed within the Services
- An in-app notification or banner upon your next login

Your continued use of the Services after the effective date of any revised Privacy Policy constitutes your acceptance of the updated terms. We encourage you to review this Privacy Policy periodically to stay informed about our data practices.

12. CONTACT INFORMATION

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us using the information below:

MJG9 Group LLC

Privacy Inquiries: privacy@mjpg9group.com

General Inquiries: info@mjpg9group.com

Mailing Address: [To be provided by MJG9 Group LLC]

For inquiries specifically related to Plaid and how Plaid handles your financial data, you may also contact Plaid directly at:

legalnotices@plaid.com

13. COMPLIANCE STATEMENTS

This Privacy Policy is designed to comply with applicable U.S. federal and state privacy laws, including but not limited to:

- **California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA):** MJG9 Group LLC respects the rights of

California residents as set forth under the CCPA and CPRA, including the right to know, the right to delete, and the right to opt out of the sale of personal information. As stated in this Privacy Policy, we do not sell personal information.

- **Gramm-Leach-Bliley Act (GLBA):** To the extent that MJG9 Group LLC is subject to the GLBA, we maintain safeguards and practices consistent with its requirements for the protection of nonpublic personal information.
- **State-Level Consumer Protection Laws:** We comply with other applicable state consumer privacy and data protection laws, including those enacted in Virginia, Colorado, Connecticut, Utah, and other states with comprehensive privacy legislation.

MJG9 Group LLC complies with Plaid's Developer Policy regarding data handling, security, and user privacy. Our integration with Plaid is implemented in accordance with Plaid's production requirements and best practices for data minimization, secure credential management, and transparent end-user disclosure.

The Company maintains compliance with industry-standard security frameworks and conducts regular reviews to ensure ongoing alignment with evolving regulatory requirements and security best practices.

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