

DAO CARD, INC.

WEBSITE PRIVACY POLICY / NOTICE

Last Updated: [August 18, 2026]

1. Introduction

Dao Card, Inc. (“Dao,” “we,” “us,” or “our”) respects your privacy and is committed to protecting the personal information you share with us. This Website Privacy Policy / Notice (“Policy”) describes how we collect, use, disclose, and protect information when you:

- visit our website at <https://daocards.com> (the “Website”);
- use our online card management platform and dashboard (the “Platform”);
- apply for or use the Dao Commercial Card Program; or
- otherwise interact with us online or offline.

Cards issued through the Dao Commercial Card Program are issued by Austin Capital Bank (“Bank”) and serviced by Dao. Where the Bank processes your personal information in connection with card issuance, the Bank's own Privacy Policy [<https://austincapitalbank.com/privacy-policy/>] also applies.

Please read this Policy carefully. By using the Website or Platform, or by participating in the Dao Commercial Card Program, you acknowledge the practices described in this Policy.

2. Scope and Applicability

This Policy applies to:

- Business customers and their representatives, account administrators, and authorized cardholders (“Business Users”) who enroll in or use the Dao Commercial Card Program;
- Visitors to the Website who are browsing our content, reading about our services, or contacting us; and
- Any other individuals whose personal information Dao processes in connection with its services.

This Policy does not apply to the practices of third parties that Dao does not own or control, including Austin Capital Bank or third-party service providers operating under their own privacy policies. References to the Commercial Card Agreement, the Dao Terms of Service, or the Bank's Privacy Policy govern separately.

3. Information We Collect

We collect several types of information in connection with the Website, Platform, and Card Program.

3.1 Information You Provide Directly

- Account and identity information: legal name, date of birth, government-issued ID numbers, Social Security number or Employer Identification Number (for Know Your Customer / KYC purposes), and business registration information;
- Contact information: email address, mailing address, telephone number;
- Financial information: bank account details (for Payment Account designation and ACH authorization), business financial statements, credit history, and transaction data;
- Authorized Cardholder information: names, contact information, dates of birth, and employment information for employees and representatives you designate as Authorized Cardholders;
- Communications: information you provide when you contact us for support, respond to surveys, or submit inquiries via the Website or Platform.

3.2 Information Collected Automatically

When you visit the Website or use the Platform, we and our service providers may automatically collect:

- Log and usage data: IP address, browser type and version, operating system, referring/exit URLs, pages viewed, time spent, and clickstream data;
- Device information: device identifiers, hardware model, and mobile network information;
- Transaction data: details of Purchases, Cash Advances, and other Transactions made using Cards, including merchant names, amounts, dates, and Merchant Category Codes;
- Cookies and similar technologies: see Section 6 (Cookies and Tracking Technologies) for details.

3.3 Information from Third Parties

We may receive information about you from:

- Austin Capital Bank, its service providers and other financial institutions: for credit underwriting, fraud detection, and KYC compliance;
- Card Networks (e.g., Visa, Mastercard): transaction processing and dispute data;
- Credit bureaus and data aggregators: credit reports and financial data used to evaluate Spending Limits;
- Identity verification and sanctions screening services: for OFAC and Bank Secrecy Act compliance;
- Third-party payment account data providers: to verify account balances and spending patterns as authorized by you.
- Other vendors and third party service providers that we or Austin Capital Bank may retain from time-to-time to provide you with necessary services to support or facilitate your account, provide the agreed-upon services, and assist with servicing and collection of past due accounts.

4. How We Use Your Information

We use the information we collect for the following purposes:

- Providing and administering the Card Program: processing applications, issuing Cards, managing Master Accounts, processing Transactions, and delivering Periodic Statements;
- Identity verification and compliance: conducting KYC/AML checks, verifying Authorized Cardholders, screening against OFAC sanctions lists, and complying with Bank Secrecy Act and other Applicable Laws;
- Credit underwriting and Spending Limits: evaluating your creditworthiness, setting and adjusting Spending Limits, and managing credit risk;

- Fraud prevention and security: monitoring Transactions for suspicious activity, investigating unauthorized use, and protecting the integrity of the Platform and Card Program;
 - Communications: sending Periodic Statements, alerts, notices required by this Agreement, and service-related communications;
 - Customer support: responding to inquiries, resolving disputes, and providing assistance with your account;
 - Marketing and promotions: with your consent where required by law, sending information about Dao products, features, and promotional offers; you may opt out at any time (see Section 8);
 - Product improvement: analyzing usage of the Website and Platform to improve features, fix bugs, and develop new services;
 - Legal compliance and enforcement: complying with legal obligations, responding to legal process, and enforcing our agreements.
 - Collections.
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5. How We Share Your Information

We do not sell your personal information. We may share information in the following circumstances:

- Austin Capital Bank: as the card-issuing bank, receives information necessary to issue Cards, process Transactions, conduct KYC/AML compliance, and manage credit risk under the Cardholder Agreement;
 - Card Networks and payment processors: Visa, Mastercard, or other applicable Card Networks receive Transaction data necessary to process Purchases and Cash Advances;
 - Service Providers: we engage third-party vendors who process data on our behalf for identity verification, fraud detection, data analytics, customer support, cloud hosting, servicing, collections, and other operational functions. These vendors are contractually required to protect your data and use it only for authorized purposes;
 - Affiliates: we may share information with our corporate affiliates for the purposes described in this Policy;
 - Legal and regulatory disclosures: we may disclose information to regulators, law enforcement, courts, or other governmental authorities when required by law, subpoena, or other legal process, or when we believe disclosure is necessary to protect our rights or the safety of others;
 - Business transfers: in connection with a merger, acquisition, sale of assets, or other corporate transaction, your information may be transferred as part of that transaction, subject to appropriate confidentiality protections;
 - With your consent: we may share information for other purposes with your prior written consent.
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6. Cookies, Web Beacons and Other Tracking Technologies

We, our service providers, and certain third-party partners may use cookies, web beacons, pixel tags, software development kits (SDKs), local shared objects, and similar tracking technologies to support the operation, security, and performance of the Website and Platform. These technologies may also help us understand how users interact with our services, improve functionality, prevent fraud, authenticate users, measure the effectiveness of communications, and support our marketing and business operations. Some of these technologies may collect information about the device and browser used to access our services, including device identifiers, browser settings, IP address, and usage data.

Cookies. Cookies are small data files that websites place on a user's device. Cookies help us recognize returning users, maintain user sessions, remember preferences, enhance security, and better understand how our Website and Platform are used. Cookies may also enable us and our service providers to analyze usage trends and improve the user experience over time. Most web browsers allow you to control, disable, or delete cookies through browser settings; however, doing so may affect the availability or functionality of certain features of the Website or Platform.

Web Beacons, Pixel Tags, and Similar Technologies. Web beacons, pixel tags, clear GIFs, and similar technologies are small graphical elements that may be embedded in webpages, online content, or email communications. These technologies help us understand user engagement, measure the effectiveness of communications and marketing campaigns, monitor site performance, and analyze traffic patterns. They may also be used to determine whether emails or other electronic communications have been opened or interacted with.

Local Shared Objects and Similar Technologies. Certain features of our Website or Platform may utilize local shared objects or similar technologies that store information on your device. These technologies function in a manner similar to cookies but may be managed differently depending on the software or device being used. They may be used to support security, authentication, performance optimization, or user preferences.

Analytics and Advertising Technologies. We may use analytics providers and similar technologies to help us understand how visitors use our Website and Platform, improve our services, and evaluate the effectiveness of our marketing efforts. Where permitted by applicable law, we or our service providers may use cookies and similar technologies to provide information about Dao products and services that may be relevant to your interests. You may be able to manage certain tracking technologies through your browser settings or other available preference controls.

7. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes described in this Policy, including:

- For active accounts: throughout the term of the Cardholder Agreement and your use of the Card Program;
- After account closure: for a period of at least seven (7) years (or longer if required by law) to comply with federal and state record-keeping requirements, including the Bank Secrecy Act, tax laws, and applicable statutes of limitations;
- For Website visitors: as needed for analytics and security purposes, typically no longer than two (2) years.

When retention periods expire, we securely delete or de-identify personal information in accordance with our data retention policies.

8. Data Security

We implement administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. These measures include encryption of data in transit and at rest, access controls, multi-factor authentication for Platform access, and regular security assessments.

No security system is impenetrable. We cannot guarantee the absolute security of your information, and we are not responsible for third-party interceptions or unauthorized access that occur beyond our reasonable control. If you believe your account or personal information has been compromised, please contact us immediately by emailing us at help@daocards.com.

9. Your Privacy Rights

Depending on your location, you may have certain rights with respect to your personal information, as described below.

9.1 Rights for California Residents (CCPA / CPRA)

If you are a California resident, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), grants you the following rights, subject to applicable exceptions:

- **Right to Know:** the right to request disclosure of the categories and specific pieces of personal information we have collected about you, the categories of sources from which it was collected, the business or commercial purposes for collecting or sharing it, and the categories of third parties with whom we share it;
- **Right to Delete:** the right to request deletion of personal information we have collected about you, subject to certain exceptions;
- **Right to Correct:** the right to request correction of inaccurate personal information;
- **Right to Opt Out of Sale or Sharing:** we do not sell or share your personal information for cross-context behavioral advertising;
- **Right to Limit Use of Sensitive Personal Information:** the right to direct us to limit the use of sensitive personal information (such as government ID numbers and financial account details) to purposes permitted by the CPRA;
- **Right to Non-Discrimination:** we will not discriminate against you for exercising your CCPA/CPRA rights.

To exercise your California privacy rights, please submit a request as described in Section 9.4. We will respond to verifiable consumer requests within 45 days, with an extension of up to 45 additional days where reasonably necessary.

Note: Certain personal information processed in connection with the Dao Commercial Card Program may be exempt from CCPA rights to the extent it is subject to the Gramm-Leach-Bliley Act (GLBA) or other applicable financial privacy laws.

9.2 Rights for Texas Residents

Texas residents may have rights under the Texas Data Privacy and Security Act (TDPSA), including rights to access, correct, delete, and obtain a portable copy of personal data we process, and the right to opt out of the processing of personal data for targeted advertising or profiling. To exercise these rights, please submit a request as described in Section 9.4.

9.3 General Rights

Regardless of your location, you may:

- **Opt out of marketing communications:** unsubscribe from promotional emails at any time by clicking the “unsubscribe” link at the bottom of any marketing email or by contacting us;

- Request access to or correction of your account information through the Platform or by contacting us directly;
- Request that we restrict the processing of your personal information for direct marketing purposes.

9.4 How to Submit a Privacy Request

To exercise any privacy rights described in this Section, please contact us at help@daocards.com.

We may need to verify your identity before processing your request. Authorized agents may submit requests on your behalf with appropriate written authorization or power of attorney.

10. Children's Privacy

The Website and Card Program are intended for business use by adults (18 years of age or older). We do not knowingly collect personal information from children under the age of 13. If you believe we have inadvertently collected information from a minor, please contact us immediately by emailing us at help@daocards.com and we will take steps to delete such information.

11. Third-Party Websites and Services

The Website and Platform may contain links to or integrations with third-party websites, services, and applications that are not operated by Dao. This Policy does not apply to those third-party services. We encourage you to review the privacy policies of any third-party services you access. Dao is not responsible for the privacy practices or content of third-party services.

12. Notice to Business Customers — Financial Privacy (GLBA)

To the extent applicable, this Policy also serves as notice under the Gramm-Leach-Bliley Act (GLBA). Dao and Austin Capital Bank collect and share financial information as necessary to administer the Dao Commercial Card Program. Categories of financial information and the purposes for which they are shared are described in Sections 3 and 5 above.

We do not share personal financial information with non-affiliated third parties for marketing purposes without your consent.

13. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. Your continued use of the Website, Platform, or Card Program after the effective date of any updated Policy constitutes your acceptance of the changes.

14. Contact Us

If you have questions, concerns, or complaints about this Policy or our privacy practices, please contact us:

Dao Card, Inc.

Attn: Cardholder Relations

3300 N Interstate 35, 7th Floor

Austin, TX 78705

Email: help@daocards.com

Phone: 484-326-2273