



UGLYCASH

BFF United - UGLYCASH Privacy Policy

Last Updated: April 30, 2025.

This Privacy Policy describes how BFF United, LLC ("**the Company**", "**we**", "**us**" or "**our**") collects, uses, stores, shares, and protects your information when you use the UGLYCASH mobile application ("UGLYCASH App").

1. Important Information

a. Purpose of This Privacy Policy

We understand how important privacy is to our users, which is why we only collect the information we need and will not share your personal information with third parties unless it is necessary. Even within the Company, access to your personal information is limited to employees, contractors, and third-party service providers who require such information to manage matters related to the UGLYCASH App, your transactions, and the fulfillment of our compliance programs and service relationships.

It is essential that you read this Privacy Policy together with any other privacy notices or fair processing notices we may provide on specific occasions when we are collecting or processing personal data about you. This Privacy Policy supplements those other notices and is not intended to override them.

b. Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We may update this Privacy Policy from time to time. When we do, we will update the "Last Updated" date at the top of this policy. We will also provide an annual privacy notice in accordance with our Gramm-Leach-Bliley Act Policy. It is important that the personal data we hold about you is accurate and current. If you need to update or correct any information, you can do so within the UGLYCASH App. You are responsible for reviewing this Privacy Policy periodically. By continuing to use the UGLYCASH App and by completing a transaction after any updates, you are deemed to have accepted the revised Privacy Policy.

c. Third-Party Links

The UGLYCASH App may include links to third-party websites, plug-ins, or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. When you leave our App, we encourage you to read the privacy notice of every website you visit.

2. Information We Collect

We need to collect personal information about you in order to provide you with the appropriate services or support. We collect personal data when you register a UGLYCASH App Account, complete our identity or account verification process, authenticate your account, communicate with us, participate in contests or promotions, or otherwise use our services. “Personal data” or “personal information” means any information about an individual that can be used to identify that person. It does not include information where the identity has been removed (anonymous data). We may collect, use, store, and transfer different types of personal data about you, which we have grouped as follows:

- **Identity Data** includes your first name, birth name, last name, title, username or similar identifier, tax identification number, marital status, date of birth, gender, government-issued identification number, nationality, and any other information contained in any identification document you provide to us (e.g., your passport or driver’s license).
- **Contact Data** includes your billing address, residential address, email address, and telephone numbers.
- **Financial Data** includes your bank account details.
- **Transaction Data** includes details about your activity, such as the amount, date, time, and recipient of each transaction.
- **Technical Data** includes your Internet Protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the UGLYCASH App.
- **Profile Data** includes your username and password, your preferences, feedback, and any responses to surveys.
- **Usage Data** includes information about how you use the UGLYCASH App and the data collected through it.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, as well as your communication preferences.
- **Location Data** includes information about the location of your device.

We also collect, use, and share **Aggregated Data**, such as statistical or demographic information, for any purpose. Aggregated Data may be derived from your personal data, but is not considered personal data under the law, as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to determine the percentage of users who access a specific feature of the application. However, if we combine or link Aggregated Data with your personal data in a way that could directly or indirectly identify you, we treat the combined data as personal data and will handle it in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information, or genetic and biometric data).

You may choose to provide us with additional information to enhance your user experience while using the UGLYCASH App.

- **Contact Information.** You may choose to allow us to access and upload your phone contacts to make it easier for you to find people you wish to send money to, help you invite friends to the UGLYCASH App, assist with account and identity verification and fraud prevention, reduce the risk of sending payments to the wrong recipient, or enable other personalized services. You may update your settings at any time to stop sharing your phone contacts with us.

- **Other Information.** We collect information that you voluntarily provide to us, including survey responses, participation in promotions and contests, customer support inquiries, suggestions for improvement, referrals, or any other actions you take while using the UGLYCASH App.

a. Criminal Conviction Information

When you register for an account with the UGLYCASH App, we may receive information about your criminal convictions as part of certain compliance checks or screenings. This is done to detect or prevent illegal or fraudulent activity and to comply with applicable legal obligations.

b. If You Fail to Provide Personal Data

If we are required by law, or under the terms of a contract we have with you, to collect personal data, and you fail to provide such data when requested, we may need to restrict or terminate your access to the UGLYCASH App. We will notify you at the time if this is the case. By using the UGLYCASH App, you agree to promptly provide any information we may request.

3. How We Collect Your Personal Data

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may provide us with your identity, contact, financial, transaction, profile, usage, marketing, communications, and location data by submitting it through the UGLYCASH App. This includes personal data you provide when you:
 - Create or use your account on the UGLYCASH App;
 - Set up a bank transfer to your UGLYCASH App account;
 - Are asked to provide additional information to verify your identity or to comply with our legal obligations;
 - Request to receive marketing communications;
 - Participate in a survey; or
 - Provide us with feedback.
- **Automated technologies or interactions.** As you interact with the UGLYCASH App, we may automatically collect technical and usage data about your device, browsing actions, and patterns. We collect this personal data through the use of cookies, server logs, and other similar technologies. We may also receive technical data about you if you visit other websites that use our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, including:
 - Technical data from analytics providers such as Google;
 - Contact, financial, and transaction data from technical or payment service providers;
 - Identity and contact data from verification or compliance service providers.
- By providing us with personal data about any individual other than yourself, you confirm that you have obtained that person's consent to disclose their personal data to us for processing in accordance with this Privacy Policy.

4. How we use your personal data

We collect this information to provide you with a secure and seamless experience when using the UGLYCASH App. The information we collect enables us to:

- Provide the full functionality of the UGLYCASH App;
- Comply with our legal and regulatory obligations, as well as those of our financial partners and service providers;
- Stay connected with you—whether to provide customer support, notify you of new features or updates to the UGLYCASH App, or deliver security notices or other important information;
- Verify your identity in order to prevent fraud or unauthorized activity; and
- Fulfill any other purpose for which the information was collected.

We will never sell or rent your personal data to third parties. We may combine your information with data collected from other sources and use it to enhance and personalize the UGLYCASH App, as well as our content and advertising.

a. Marketing

We strive to provide you with choices regarding certain uses of your personal data, particularly with respect to marketing and advertising. We have established the following mechanisms to manage your personal data:

(i) Promotional Offers from Us

We may use your identity, contact, technical, profile, and usage data to form a view on what we think you may want or need, or what may be of interest to you. This is how we determine which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if (a) you have requested information from us; (b) you use the UGLYCASH App; or (c) you provided your details when registering for a promotion and have not opted out of receiving marketing communications.

(ii) Third-Party Marketing

We will obtain your express opt-in consent before sharing your personal data with any company outside the Company for marketing purposes.

(iii) Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links provided in any marketing message sent to you or by contacting support through the UGLYCASH App at any time.

Opting out of receiving marketing communications will not apply to personal data provided to us as a result of your use of the UGLYCASH App.

b. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the UGLYCASH App may become inaccessible or may not function properly.

5. How We Share Your Personal Data

We may need to share your personal data with the parties listed below for the purposes outlined in Section 4 above:

- **Law Enforcement and Regulatory Authorities** – We may disclose your information if we believe it is reasonably necessary: (1) to comply with any applicable law, regulation, legal process, or governmental request; (2) to establish, exercise, or defend our legal rights; (3) to enforce our Terms of Service or other applicable agreements or policies; (4) to protect our rights or property, or those of our users, or to maintain the safety or integrity of our services; (5) to investigate suspected or actual illegal activity or violations of our User Agreement; or (6) to protect ourselves, our users, or the public from harm, fraud, or potentially prohibited or illegal activities.
- **Service Providers** – The Company may share your personal information with other companies that assist us in providing, maintaining, and improving our services (for example, vendors that assist us with fraud prevention and identity verification), as well as with financial institutions, payment networks, and other entities in connection with your use of the UGLYCASH App.
- **Other Users** – We may share your personal information with individuals with whom you transact through the UGLYCASH App. This helps them confirm that they are receiving money from you (or that you have requested a payment from them). We may also make certain information available to other UGLYCASH App users to help them verify that they are sending a payment to the correct person. The personal information shared with the individual(s) you transact with will be limited to the essential data necessary to complete transactions securely.
- **Professional Advisors** – In order to meet our legal obligations, we may need to share information about your account with professional advisors acting as processors or joint controllers, including consultants, banking institutions, legal counsel, compliance providers, insurance providers, or accounting firms.
- **Third Parties** – We may choose to sell, transfer, or merge parts of our business or assets with third parties. Alternatively, we may acquire other businesses or merge with them. If a change occurs in our business, the new owners may use your personal data in the same manner as set out in this Privacy Policy.
- We will also share your information with other third parties if you specifically authorize us to do so.

6. How We Protect Your Personal Data

We protect your information using physical, technical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure, and alteration. Some of the security measures we use include firewalls and data encryption, physical access controls to data centers, and access authorization controls for information. Data may be stored with a third-party company, which may have its own firewalls and data encryption systems that we do not manage. At times, to better protect your information and use it for the purposes outlined in this Privacy Policy, certain personal data may be stored with our external partners. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know such information.

7. Users Under the Age of 18

The UGLYCASH App is not intended for individuals under the age of 18, and we do not knowingly collect information from individuals under 18 without parental consent. If we learn that we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at support@ugly.cash.

8. California Privacy Rights

California residents may have additional rights regarding our use of their personal information. For more information about your California privacy rights, please visit [this link](#). California residents have the right to request a copy of the personal information collected about them during the past 12 months. California residents will not be discriminated against for exercising their rights under the California Consumer Privacy Act (CCPA). If you request a copy or deletion of your personal information, we may ask you to provide additional personal information to verify your identity before processing your request. We may still need to retain certain information about you to comply with the Bank Secrecy Act. To request additional information or to submit a request under the CCPA, please contact us at support@ugly.cash.

9. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements. Our regulatory requirements obligate us to retain customer personal data and transaction history for five (5) years after the end of the customer relationship.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, whether those purposes can be achieved through other means, and applicable legal requirements. If you wish to close your account, please be aware that we may still be required to retain certain information you have provided for several years.

In some circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Contact Information

Please contact our support team if you have any questions, concerns, or comments about this Privacy Policy by emailing us at support@ugly.cash.

To file a complaint or express a concern, please use the contact information above to reach our privacy team. We will respond promptly to let you know when you can expect a further response. Any terms not covered by this Privacy Policy will be governed by the terms of the User Agreement that you agree to when opening your UGLYCASH App account.