

General Privacy Policy

Purpose

Evergreen Wealth Corporation and its wholly owned subsidiaries, Evergreen Wealth Advisors Corporation and Evergreen.ai ("Evergreen," "we," "us," or "our") take your privacy and data security seriously. As the data controller, Evergreen is responsible for the collection, use, and disclosures of Personal Information through our websites, including www.evergreen.ai and www.evergreenwealth.com (collectively, the "Website") and our products and services including, without limitation, any mobile or web-based applications such as Evergreen.ai (collectively with the Website, "Services"). Evergreen.ai provides AI-powered financial advice offered to you through Evergreen Wealth Advisors Corporation ("EWA"). Evergreen.ai is not itself a Registered Investment Adviser; paid investment advisory services are provided only by EWA.

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

This Policy describes:

- The types of Personal Information we collect;
- How we use and disclose Personal Information;
- The measures we take to protect your Personal Information;
- Your choices regarding our use of your Personal Information; and
- How to contact us with questions about our privacy practices.

Relationship to Client Privacy Notices

This Policy applies broadly to visitors of our Website, and clients who use our Services, including Visitors, Users, and Clients as those terms are defined in our [Terms of Use](#). It explains how Evergreen collects, uses, and shares Personal Information in connection with online activity, including cookies, analytics, and marketing.

For clients of Evergreen who obtain financial products or services, federal law (such as the Gramm-Leach-Bliley Act) provides additional privacy protections. Those protections are described in the Privacy Notices for the respective entities (Evergreen Wealth Corporation and Evergreen Wealth Advisors Corporation), which are provided at account opening, annually thereafter, and are also available in the [Privacy Center](#) of our Website.

What Does This General Privacy Policy Cover?

This General Privacy Policy covers the treatment of personally identifiable information ("Personal Information") we gather when you use or access the Services and any Personal Information shared between us and any third party for use in connection with our Services. It is intended to inform you, at or before collection, of the categories of information that we collect, and the purposes for which that information is used.

By using our Services, you authorize us to collect, process, use, and share your Personal Information as described in this Policy, including with trusted third-party service providers, for purposes necessary to provide and improve the Services, subject to appropriate confidentiality and legal safeguards.

When Evergreen shares your Personal Information with vendors and other third party service providers ("Third-Party Service Providers") who function on our behalf, we require them to take certain steps to ensure the security and confidentiality of your Personal Information, as well as limiting their use of the Personal Information to what is reasonable and necessary to carry out their work with us and comply with applicable laws and regulations.

This General Privacy Policy does not apply to Third-Party Service Providers that you elect to access through the Services or that you share information with directly. While we attempt to facilitate access only to those Third-Party Service Providers that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third-Party Service Providers. We encourage you to carefully review the privacy policies of any Third-Party Service Providers you access.

Types of Data We Collect

We may collect the following categories of Personal Information:

- **Identifiers:** Your full name, billing and mailing address, email address, phone number, username/password, government issued identification numbers and images of relevant identification cards (e.g., Social Security number, passport, driver's license) date of birth.
- **Financial Information and Payment Data:** Bank account details, transaction history from linked accounts, routing/account numbers for authorized accounts, payment card information, income information, investment goals.

- **Internet/Device Information:** IP address, browser type, operating system type and version, device type, unique identifiers, usage data (website you visited before browsing to the Service, page visits, time spent, clicks, etc.).
- **Commercial Information:** Transaction history with us.
- **Geolocation Data:** Derived from your device or IP address.
- **Communications Data:** Records of your communications with us via email, SMS, push notifications, including whether you have opened an email or clicked links within them – we may do this through use of pixel tags (which are also known as clear GIFS), which may be embedded invisibly in our emails.
- **Marketing Data:** Your preferences for receiving our marketing communications and details about how you engage with them
- **Cookies and Tracking Technologies:** Data collected through cookies, pixels, and similar technologies to recognize your browser, analyze usage, personalize content, and deliver relevant marketing.
- **Biometric Data:** Facial geometry and voice characteristics collected when you use certain Services that involve real-time interaction. Biometric data is collected only upon your consent and used solely to deliver the session or, where applicable, for enrollment, identity verification, and account recovery purposes. See the “Biometric Data Policy for U.S. Users” section below for full details.

All requested Personal Information is mandatory to enable us to provide the Services.

Biometric Data Policy for U.S. Users

Evergreen collects and processes information that may be considered “biometric data” under certain laws from individuals who use our Services. When you choose to use our Services, Evergreen will process your biometric data as described in this Biometric Data Policy.

Biometric Data

Biometric data is identifying information derived from your physical characteristics that may be used to identify you. Depending on the Services you use, Evergreen may process your facial geometry and, in certain contexts, your voice characteristics. This may include real-time processing during interactions with Services, as well as processing during enrollment, identity verification, and account recovery.

Identity Verification Using Biometric Technology

To fulfill our regulatory compliance obligations, including Know Your Customer (KYC), 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 as well as 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 implement appropriate security standards and to process your biometric data only as necessary to deliver identity verification services on our behalf. The specific terms governing how these providers handle, retain, and delete biometric data are subject to the agreements in place with each provider.

Biometric Data Collection

Evergreen collects biometric data when you consent to this Privacy Policy during registration. 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.

Certain Services may also use your camera to process your facial geometry in real time during a session. You may disable your camera at any time. If you decline to enable your camera, real-time facial processing will not occur and your session experience will not otherwise be affected.

Use of Biometric Data

Evergreen does not use your biometric data to train AI models or build user profiles. Biometric data is used solely for the following purposes:

- Identity verification, regulatory compliance, and fraud prevention during enrollment;
- Liveness and anti-spoofing checks to confirm you are a real, live person;
- Comparison of your facial geometry against your government-issued identification document to confirm identity; and

- Delivering Services where real-time camera-based interaction is enabled.

Session transcripts, which are text records of a conversation and are 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 of Biometric Data

Evergreen takes data security seriously and has implemented data security measures designed to protect biometric data as described in the "Is Information About Me Secure" section below. Biometric data is encrypted and transmitted securely and we require our third-party service providers to maintain reasonable security safeguards to protect biometric data from unauthorized access, disclosure, or use, and to securely destroy biometric data when it is no longer needed for the purpose for which it was collected.

Biometric Data Sharing

Evergreen shares biometric data solely as necessary to deliver the Services:

- We share biometric data with third-party identity verification and fraud prevention providers to perform enrollment verification services on our behalf. We expect these providers to use your biometric data only for the purpose of delivering those services.
- 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.

Retention

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 using the information 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@evergreenwealth.com.

Visitor Identification and Data Enhancement

Visitor Identification

We use certain Third-Party Service Provider technologies to enhance information regarding visitors to our Website and to identify anonymous visitors to our Website. These technologies may analyze browsing behavior, IP addresses, and device characteristics to infer potential identity, even if you have not submitted any Personal Information. This allows us to:

- Better understand who is visiting our website;
- Provide more personalized responses when you reach out; and
- Improve the effectiveness of our marketing efforts.

You may opt out of this type of identification by enabling “Do Not Track” in your browser.

Data Enhancement Services

If you submit your information through a form on our Website (such as your name or email), we may use Third-Party Service Providers to add additional data to your profile. This information may come from publicly available sources (including social media platforms), data licensors, marketing partners, or other Third-Party Service Providers. Information we obtain may include:

- Demographic data (e.g., estimated age range, household type)
- Financial indicators (e.g., estimated income range, property status)
- Professional or contact data (e.g., business title, updated address)

These enhancements help us tailor our services and communications more effectively to your financial goals. We do not sell this Personal Information to third parties.

How We Collect Data

We collect Personal Information:

- Directly from you (for example from applications, forms, account linking).
- Automatically when you interact with our Services (cookies, system logs, analytics).
- From Third-Party Service Providers such as fraud detection services, identity verification, data providers, and analytics vendors.

- To provide you with more personalized financial guidance and advice. The more accurate and complete the information you provide, the more tailored guidance and advice can be to your circumstances.

How We Use Your Information

We use your Personal Information to:

- Provide and improve our Services;
- Verify your identity;
- Process transactions and applications;
- Detect and prevent fraudulent, harmful, unauthorized, unethical, or illegal activity;
- Protect our, your, and other's rights, privacy, safety, or property;
- Comply with applicable laws, regulations, and legal processes;
- Enforce terms and conditions that govern the Service;
- Create aggregated, de-identified and/or anonymized data;
- Send you communications about our Services, including direct and interest-based marketing messages (you may opt out at any time); and
- We may use artificial intelligence to analyze your financial information, assess risk, and provide personalized recommendations. These tools are subject to human oversight and are designed to enhance, not replace, the advice provided by our professionals.
- Help you analyze your financial information and provide Users general financial guidance and personalized financial advice to help you make more informed financial decisions.

Data Retention and Deletion

Personal Information is retained only as long as necessary: to fulfill the purposes for which it was collected; to meet legal, accounting, or regulatory obligations; to establish or defend legal claims; or for fraud prevention. When Personal information is no longer required, it is securely deleted or anonymized in accordance with company policy.

In the event of a broker-dealer or custodian change, we may transfer necessary Personal Information to the new broker-dealer or custodian so that we can continue providing you with the Services.

Cookies and Tracking Technologies

We use cookies and other tracking tools and similar technologies to operate our Services, for analytics, and for interest-based advertising. This may be considered 'sharing' under some state privacy laws. Some of our marketing cookies enable visitor identification. These cookies may link anonymous behavior to known identities using external databases. We use this data to provide a more relevant experience and to help our team prepare personalized responses when a visitor contacts us.

We operate under an implied consent model where cookies are enabled by default. By continuing to use our Website, you consent to our use of cookies as described here and in our Cookie Policy. Most web browsers have an option for turning off the cookie feature which, depending on your browser, may prevent your browser from accepting new cookies or allow you to choose whether to accept each new cookie. Turning off cookies may impact your ability to take full advantage of the Services' features. For additional details, see our [Cookie Policy](#).

Data Sharing

We may share your Personal Information:

- With affiliates (for example between Evergreen Wealth Corporation, Evergreen Wealth Advisors, and Evergreen.ai or other parent, subsidiary, or affiliated companies);
- With Third-Party Service Providers (such as our broker-dealers and custodian partners, Plaid, hosting, customer support, artificial intelligence providers, chat functionality providers, email delivery, marketing, analytics, etc.);
- With third parties as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this General Privacy Policy and our [Terms of Use](#), including investigation of potential violations hereof, (iii) detect, prevent or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users, and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention;
- With third party advertising companies for interest-based advertising as described herein;
- In connection with business transfers such as a merger, acquisition, or sale of all or part of our company, or if we go out of business or enter bankruptcy.

Any acquirer of us or our assets may continue to use your Personal Information as set forth in and in accordance with this policy; and

- With your consent for other purposes.

We do not sell your Personal Information to third parties for their own marketing purposes without your consent.

Place of Processing

Data is transferred to, processed, and stored in the United States, and may be transferred to, stored, or processed in other jurisdictions where our Third-Party Service Providers operate.

Your Privacy Rights – State Laws

Depending on your state of residence (for example California), 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 the sale or sharing of Personal Information (where applicable), except where the 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; and
- Limit the use/processing/disclosure of sensitive Personal Information.

To exercise these rights, please contact us using the methods described in the “How to Exercise Your Rights” section.

How to Exercise your Rights

You can exercise your choice by:

- Calling us at +1 (888) 884-0557
- Emailing us at clientservice@evergreenwealth.com
- Writing to us at:

Evergreen Wealth Corporation
Attn: Compliance Department
5540 Centerview Dr.
STE 204 PMB #48153
Raleigh, NC 27606-8212

If you have a joint account, each accountholder may make their own choice. Any accountholder's choice will apply 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 us at: clientservice@evergreenwealth.com 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. 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 (COPPA):

Our Services are not directed to children under the age of 13, and we do not knowingly collect Personal Information from anyone under the age of 13. 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.

Bank Account Information:

Registered users of the Services 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 that you choose to designate for use in connection with the Services (each, an "Authorized Bank Account").

We work with one or more Third-Party Service Providers, such as Plaid, that will securely store pursuant to industry standards any Authorized Bank Account access information that you provide to us and will access your Authorized Bank Accounts for the purposes of providing and improving the Services.

You may only provide account access and authorization for us to access valid accounts that you hold in your own name. You may not provide access for an account that is held by a

third person. You must update your Evergreen account information to reflect any change to the username or password that is 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 Services. This authorization will remain in effect until you notify us that you wish to revoke this authorization, which may affect your ability to receive the Services.

We never have access to your login information for a third party bank.

Text Messages and Push Notifications:

If you sign-up for the Services or otherwise provide your contact information to us, including during the application process whether that application is approved or declined, you will provide us with Personal Information that may include your phone number.

By providing us with your phone number, you authorize us to contact you via text message (SMS) at that phone number, and you thereby consent to the receipt of such messages or push notifications. When we communicate with you via SMS, or push notifications, we may collect information regarding such communications, such as confirmation when you read a text message or receive a push notification. We use this information to operate and improve our customer service and other Services. Some services such as near real-time alerts require notifications to be enabled. If at any time you do not wish to receive the benefit of such services, you can turn off notifications using the functionality made available in the browser, application, or device settings. Additionally, you may opt-out of receiving most of these text messages at any time by sending us a request at clientservice@evergreenwealth.com. You acknowledge that opting out of receiving text messages may impact your use of the Services. Further, if you desire to use the Services, you cannot opt out of one-time password messages that are necessary to verify your device or identity.

More generally, we may use your contact information to send you messages about the Services. We reserve the right to contact you when we believe it is necessary, such as for account recovery purposes or suspected fraud.

Additional Information Related to Advertising and the Use of Web Beacons; Interest-Based Advertisements:

Interest-Based Advertisements

We may serve advertisements through our Services and also allow third-party digital marketing partners—including advertising servers, agencies, networks, exchanges, vendors, and research firms—to do the same. These ads may promote our own products and services, or those of third parties that we believe may be of interest to you.

To support this, we or our service providers may use tracking technologies such as pixels (also known as web beacons) delivered through the Services. These technologies enable:

- Anonymized, aggregated auditing, research, and reporting by our digital marketing partners and advertisers;
- Targeted advertisements based on your browsing behavior across our Services and other websites; and
- The ability for third parties to set, read, or modify their own cookies in your browser, as if you visited their site directly.

We do not provide your Personal Information to digital marketing partners for their use outside of the Services.

Use of Analytics Providers and Interest-Based Ads

We may use analytics service providers (such as Google Analytics) to understand how you interact with our Services and to deliver interest-based advertisements. These ads may be tailored to users who fit general profile categories or who display certain preferences or behaviors.

The information used for interest-based ads may:

- Be provided directly by users (e.g., contact or behavioral data);
- Be inferred from usage patterns across our Services or from third-party service providers; and
- Include data gathered by tracking user activities across time and across unaffiliated websites or properties.

These analytics and tracking technologies may collect non-sensitive information, such as:

- IP address;
- Web browser type;
- Pages viewed;
- Non-sensitive text entered;
- Mouse movements;
- Time spent on pages;
- Links clicked; and
- Conversion activity.

Information from analytics providers may be used by us and others to:

- Analyze usage trends;
- Track content popularity;
- Deliver relevant ads and content; and
- Better understand your online activity.

Google Analytics

We use Google Analytics to help understand how users engage with our Services. Google may use cookies in connection with these analytics. Google's collection and use of data is governed by the:

- Google Analytics Terms of Use: <https://marketingplatform.google.com/about/analytics/terms/us/>
- Google Privacy Policy: <https://policies.google.com/privacy>

You may opt out of Google's use of cookies by visiting:

- Google Advertising Opt-Out: https://www.google.com/privacy_ads.html
- Google Analytics Opt-out Browser Add-on: <https://tools.google.com/dlpage/gaoptout>

Interest-Based Ad Opt-Out Tools

Several industry organizations provide tools to help consumers manage interest-based advertising preferences. To opt out of receiving behaviorally targeted ads from participating organizations, visit:

- Network Advertising Initiative (NAI) Opt-Out: <http://www.networkadvertising.org/choices/>
- Digital Advertising Alliance (DAA) Opt-Out: <http://www.aboutads.info/choices>

Aggregate and De-identified Information:

We collect and use statistical data about how people interact with our website and services. This information, referred to as "Aggregate and De-identified Information," does not include Personal Information and cannot be reasonably used to identify, relate to, describe, or be linked to you. While some of this data may originate from Personal Information (such as your usage patterns), it is anonymized and combined with data from others so that no individual is identifiable.

We use this type of information for a variety of purposes, including:

- Understanding how users engage with our services;
- Improving our website, tools, and communications;
- Supporting internal analytics and product development;
- Working with trusted third-party service providers to help with business operations; and
- Contributing to research efforts, including those conducted by government agencies, nonprofit organizations, and academic institutions.

We may also receive non-identifiable, aggregated information from third-party service providers that they have developed or collected independently.

When Aggregate and De-identified Information is shared externally or published, it is always done in a way that does not identify you or any other individual.

Consent:

In addition to the disclosures described in this General Privacy Policy, we may also share your information, which may include your Personal Information, in additional ways, if you consent.

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. These safeguards may include, 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.

What Information of Mine Can I Access?

If you are a registered user, you can view information associated with your Account by logging into your Account. In addition, you can access and delete cookies through your web browser settings, as detailed above.