

# Golden Boot Financial — Privacy Policy (Beta)

Golden Boot Financial, Inc. ("Golden Boot," "we," "us," or "our") operates a beta savings and financial-guidance platform (the "Service"). This Privacy Policy explains what information we collect from beta users of the Service, how we use it, who we share it with, and the choices you have.

By creating an account or otherwise using the Service, you agree to the collection and use of information as described in this Privacy Policy. If you do not agree, please do not use the Service.

## 1. Beta Status

The Service is currently offered as a **limited beta**. Some features described in this policy (for example, employer-sponsored access, in-app account transfers, or human advisor support) may not yet be active. We may add, change, or remove data collection practices as the Service evolves, and we will update this policy accordingly.

## 2. Information We Collect

### 2.1 Information you provide directly

- **Account and contact information:** name, email address, phone number, mailing address.
- **Onboarding and profile information:** date of birth, marital status, dependents, employment tenure, annual salary and pay frequency, bonus and outside income, current savings, existing debts (type, balance, interest rate, term), financial goals (short/medium/long-term), risk tolerance, retirement plans, and similar financial-planning details you choose to share.
- **Communications:** messages you send us (support requests, feedback, survey responses).

### 2.2 Information from linked financial accounts (via Plaid)

If you choose to connect a bank, brokerage, retirement, or other financial account, we use **Plaid Inc.** to facilitate that connection. Through Plaid, we may receive:

- Account and routing identifiers, account type, and balances.
- Transaction history.
- Investment holdings and values.

We do not receive or store your online banking username or password — those are entered directly with Plaid or your financial institution, not with Golden Boot. See Plaid's own privacy policy at [plaid.com/legal](https://plaid.com/legal) for details on how Plaid handles your credentials.

### 2.3 Information generated by the Service

- **Recommendations and allocations** generated by our recommendation engine based on the profile information above.
- **AI-generated explanations:** we use OpenAI's API to generate plain-language explanations of recommendations. Relevant profile and financial data may be sent to OpenAI for this purpose. See Section 5.

### 2.4 Automatically collected information

- Device and log information (IP address, browser type, operating system, timestamps).
- Usage data (pages viewed, features used, session duration) via standard web analytics.
- Cookies and similar technologies necessary to operate and secure the Service.

### 3. How We Use Your Information

We use the information described above to:

- Create and administer your account.
- Aggregate and display your linked financial accounts in a single dashboard.
- Generate savings and allocation recommendations and explain them to you.
- Communicate with you about your account, the beta program, and Service updates.
- Monitor, secure, debug, and improve the Service.
- Comply with legal obligations and enforce our Terms & Conditions.

We do **not** use your information to independently move money, place trades, or otherwise take action on your accounts without your direction. See our Terms & Conditions for a full description of what the Service does and does not do.

### 4. How We Share Your Information

We do not sell your personal information. We share information only as follows:

- **Service providers who process data on our behalf**, including Plaid Inc. (financial account connectivity and data aggregation), OpenAI (generating natural-language explanations of recommendations), cloud hosting/database/infrastructure providers, and analytics and error-monitoring tools.
- **Future regulated partners**. As we move beyond beta, we expect to work with a Registered Investment Adviser ("RIA") and/or custodian/banking partners to supervise recommendations and, where applicable, execute transactions. If and when that occurs, relevant account and profile information will be shared with that partner, and we will update this policy before doing so.
- **Legal and safety reasons**, where required to comply with law, respond to legal process, or protect the rights, property, or safety of Golden Boot, our users, or others.
- **Business transfers**, such as a merger, acquisition, or sale of assets, subject to standard confidentiality protections.

We require our service providers to protect your information and use it only for the purposes we've engaged them for.

### 5. AI Processing Disclosure

Golden Boot's recommendation engine (our own rules-based logic) determines your suggested savings percentage and account allocation. We separately use OpenAI's API to translate those results into a plain-language explanation. This means limited profile and financial data (such as your goals, risk tolerance, and computed allocation — not your account login credentials) may be transmitted to OpenAI for processing. AI-generated explanations are informational only; see Section 8 of our Terms & Conditions regarding the limits of AI-generated content.

### 6. Data Security

We use reasonable administrative, technical, and physical safeguards designed to protect your information, and we are actively hardening these protections as the Service moves out of beta (including encrypted storage of financial-account tokens, restricted internal access, and secure transmission via HTTPS/TLS). However, **no method of transmission or storage is 100% secure**. Because this is a beta product, please avoid connecting accounts or

providing information you are not comfortable sharing with an early-stage service, and notify us immediately at the contact information below if you believe your account has been compromised.

## 7. Data Retention

We retain your information for as long as your account is active and as needed to provide the Service, comply with our legal obligations, resolve disputes, and enforce our agreements. You may request deletion of your account and associated data as described in Section 9.

## 8. Children's Privacy

The Service is not directed to, and we do not knowingly collect personal information from, individuals under 18. If the Service references "custodial accounts," those accounts are established and controlled by the adult account holder on behalf of a minor beneficiary; the minor is not a user of the Service and does not create an account or provide information directly to us. If we learn we have collected personal information directly from a child under 18, we will delete it.

## 9. Your Choices and Rights

Depending on your state of residence, you may have rights to:

- Access, correct, or delete the personal information we hold about you.
- Obtain a copy of your data in a portable format.
- Opt out of certain uses, such as marketing communications.
- Disconnect a linked financial account at any time within the Service, which stops future data syncing (subject to Plaid's and your institution's own retention practices).

To exercise any of these rights, contact us at **info@goldenbootfinancial.com**. We will respond within a reasonable time and in accordance with applicable law (including, where applicable, state privacy laws such as the California Consumer Privacy Act).

## 10. Cookies

We use cookies and similar technologies necessary for authentication, security, and basic site functionality. Because the Service is in beta, we currently use minimal analytics; if that changes, we will update this section and provide any consent mechanisms required by applicable law.

## 11. Changes to This Policy

We may update this Privacy Policy as the Service develops, particularly as we exit beta and add features such as employer-sponsored access or RIA-supervised recommendations. We will post the updated policy with a new "Last updated" date and, for material changes, notify you directly (e.g., by email).

## 12. Contact Us

Golden Boot Financial, Inc.

Email: **info@goldenbootfinancial.com**

Founder contact: **noah@goldenbootfinancial.com**

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