

Custodia Bank, Inc.

Privacy Notice

Last updated: June 23, 2026

FACTS		WHAT DOES CUSTODIA BANK, INC. ¹ (“Custodia Bank”) DO WITH YOUR PERSONAL INFORMATION?	
Why? What? How?	Financial companies choose how they share your personal information. Federal law gives consumers and customers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
	The types of personal information we collect and share depend on the product or service you have with us. This information can include: ■ Identity verification information, such as your Social Security number and proof of residence ■ Profile information, such as your name, email address and phone number ■ Account information, such as account transactions and purchase / transaction history with us		
	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Custodia Bank chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Custodia Bank share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No
For our marketing purposes—to offer our products and services to you		Yes	No
For joint marketing with other financial companies		Yes	No
[For our affiliates’ everyday business purposes—information about your transactions and experiences		No	No
For our affiliates’ everyday business purposes—information about your creditworthiness		No	We don’t share
For our affiliates to market to you ²		No	We don’t share
For nonaffiliates to market to you		No	We don’t share
To limit our sharing	■ Contact us at 307-207-5182 ■ Email us at support@custodiabank.com ■ Mail the form below to us at: Custodia Bank, Inc. Attn: Privacy Rights Request 2120 Carey Ave. Cheyenne, WY 82001 Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing as described herein.		
	Questions?	Email us at support@custodiabank.com	

¹ In certain U.S. states, Custodia Bank, Inc. operates as Custodia Digital Services, Inc.

² Custodia Bank does not share with our affiliates.

Mail-in Form

Mark any/all you want to limit:

- ☐ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me.
- ☐ Do not share my personal information with nonaffiliates to market their products and services to me.

Name		Mail to: Custodia Bank, Inc. Attn: Privacy Rights Request 2120 Carey Ave. Cheyenne, WY 82001
Address		
City, State, Zip		
Account #		

What we do	
How does Custodia Bank protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We use various security measures, including secure data storage, access controls, and other administrative, technical, and physical safeguards.
How does Custodia Bank collect my personal information?	We collect your personal information, for example, when you ■ Open an account or verify your identity ■ Give us your contact information ■ Participate in video calls to process withdrawal requests ■ Provide account information or carry out transactions from your account ■ Submit your government-issued ID or similar identification We also collect your personal information from third parties, including identity verification providers, service providers, social media platforms, and other public or commercial sources.
Why can't I limit all sharing?	Federal law gives you the right to limit only ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ● <i>Custodia Bank does not share with our affiliates.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ● <i>Custodia Bank does not share with nonaffiliates so they can market to you</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you ● <i>Our joint marketing partners include financial institutions with whom we jointly operate the Hazel Network.</i>
Other important information	
For California Customers. If your Custodia Bank account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law. For Vermont Customers. We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. For Texas Customers. If you have a complaint, first contact the consumer assistance division of Custodia Bank, Inc., DBA Custodia Digital Services, Inc. at (307) 200-8726. If you still have an unresolved complaint regarding the company's money transmission related to Avit Stablecoin activity, please direct your complaint to: Texas Department of Banking, 2601 North Lamar Boulevard, Austin, Texas 78705, 1-877-276-5554 (tollfree), www.dob.texas.gov. Children's Privacy. We do not direct or target any piece of our Platform to children under the age of 18. If we learn that we have collected the Personal Data of anyone under the age of 18, we will take appropriate steps to delete this information. If you are a parent or guardian of someone under the age of 18 and discover that your child has submitted Personal Data to us, please contact us at support@custodiabank.com. We will make reasonable efforts to remove such information from our databases. For additional information about how we collect, use, and protect personal information beyond what is required by federal financial privacy law — including information about cookies and online tracking, third-party identity verification, data retention, international transfers, children's privacy, and your California rights — please see our full Privacy Notice at https://custodiabank.com/legal/privacy-notice/.	

