

# Privacy Policy

*How Splits collects, uses, shares, and protects your information.*

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<b>Organization</b>	Splits	<b>Owner</b>	Mustafa Alhelawe, Founder
<b>Contact</b>	privacy@splitshq.com	<b>Review cadence</b>	Annual

## 1. Introduction

This Privacy Policy describes how Splits ("Splits", "we", "us", or "our") collects, uses, shares, and protects information when you use the Splits service (the "Service") available at <https://splitshq.com>. By using the Service, you agree to the practices described in this Policy.

If you do not agree with this Policy, please do not use the Service. If you have questions, contact us at [privacy@splitshq.com](mailto:privacy@splitshq.com).

## 2. Information We Collect

### 2.1 Information you provide

When you create an account, we collect your email address and a display name. You may optionally add payment-handle identifiers (for example, a Venmo or Cash App username) to make settlement with friends easier; these are stored and displayed only to your friends within the Service.

### 2.2 Information from connected bank accounts

When you connect a financial institution through Plaid Link, we receive limited account and transaction data from Plaid. This includes the institution name, account names and the last four digits of the account number ("mask"), account balances, and a list of transactions. We use this information only to provide the Service — specifically, to detect recurring shared bills and to maintain your ledger with friends.

### 2.3 Authentication and security information

To protect your account, we collect information needed for multi-factor authentication. This may include a phone number you provide to receive one-time passcodes, a TOTP secret you generate within an authenticator app, or a registered passkey (a public key cryptographic credential bound to your device). We never store SMS passcodes or TOTP codes themselves.

### 2.4 Usage information

We collect basic information about how you interact with the Service, including IP address, browser and device information, pages viewed, and timestamps. This information is used to operate, secure, and improve the Service.

## 2.5 Cookies and similar technologies

We use cookies that are strictly necessary to keep you signed in and to remember your session and trusted-device choices. We do not use advertising or third-party tracking cookies.

## 3. How We Use Information

We use the information we collect to:

- Provide, operate, and maintain the Service, including detecting recurring shared bills and maintaining the IOU ledger between you and your friends.
- Authenticate you, protect your account, and detect or prevent fraud and abuse.
- Communicate with you about service updates, security notices, and changes to this Policy.
- Comply with legal obligations and enforce our terms.

We do not sell your personal information, and we do not use your bank-account data for advertising or to build profiles unrelated to operating the Service.

## 4. How We Share Information

We share information only as described below.

### 4.1 With your friends in the Service

Your display name, payment handles, and ledger interactions are visible to friends with whom you are connected in the Service. Transaction details from your bank are never shared with friends; only the resulting IOU entries you choose to create or that are generated by your split rules.

### 4.2 With service providers

We rely on the following processors to operate the Service:

- **Plaid:** financial-account connectivity. Plaid collects credentials directly from you within Plaid Link and provides Splits with account and transaction data on your behalf, under Plaid's own privacy policy.
- **Supabase:** database, authentication, realtime updates, and file storage.
- **Vercel:** hosting of the Splits web application.
- **Twilio:** delivery of SMS one-time passcodes for accounts that use SMS as an MFA factor.
- **Google:** optional OAuth sign-in, where you choose to sign in with a Google account.
- **PostHog:** product analytics to understand aggregate usage (events such as `bank_linked`, `rule_created`). We do not share bank-transaction data with PostHog.
- **Sentry:** application error monitoring. Stack traces and limited request context are captured when errors occur; payloads are scrubbed of sensitive fields before transmission.

Each processor is contractually obligated to handle data only on Splits' instructions and to maintain appropriate security.

#### **4.3 For legal reasons**

We may disclose information if required by law, to respond to lawful requests from public authorities, to enforce our terms, or to protect the rights, property, or safety of Splits, our users, or others. Where permitted, we will notify you of such requests.

#### **4.4 In the event of a business transfer**

If Splits is involved in a merger, acquisition, financing, or sale of assets, information may be transferred as part of the transaction. We will notify you of any material change in ownership or use of your information.

### **5. Plaid and Bank Connections**

When you choose to connect a financial institution, Splits uses Plaid to facilitate the connection. By using Plaid, you also agree to Plaid's "End User Privacy Policy". Plaid collects information from you (such as login credentials) directly within Plaid Link; Splits never receives your bank credentials. Splits receives only the financial-account data described in Section 2.2.

You can disconnect a financial institution from within the Service at any time. Doing so revokes Plaid's access to that institution on your behalf.

### **6. Data Security**

We implement administrative, technical, and physical safeguards designed to protect your information. These include encryption of data in transit using TLS 1.2 or higher, encryption of data at rest in our database (AES-256 at the storage layer, with additional application-layer encryption applied to Plaid access tokens), multi-factor authentication for end-users prior to sensitive actions, and role-based access control enforced at the database layer.

Although we work to safeguard your information, no online service can guarantee perfect security. If you have reason to believe your account has been compromised, contact us immediately.

### **7. Data Retention**

We retain your information for as long as your account is active and as needed to provide the Service, comply with legal obligations, resolve disputes, and enforce our agreements. When you delete your account, we delete your information from our active production systems within 7 days; residual copies may persist in backups for up to 30 days (our point-in-time recovery window) before being aged out. See our Data Retention and Disposal Policy for category-by-category retention windows.

## 8. Your Rights and Choices

Depending on where you live, you may have the following rights with respect to your personal information:

- Access: request a copy of the personal information we hold about you.
- Correction: request that we correct inaccurate information.
- Deletion: request that we delete your information, subject to limited exceptions.
- Portability: request a structured, machine-readable copy of your information.
- Objection / restriction: object to or request restriction of certain processing.
- Withdraw consent: where we rely on consent, withdraw it at any time.

To exercise these rights, use the in-product Settings area where available, or contact us at [privacy@splitshq.com](mailto:privacy@splitshq.com). We will respond within 30 days (with a permitted extension where the request is complex). You also have the right to lodge a complaint with your local data protection authority.

## 9. Children's Privacy

The Service is not intended for individuals under 18. We do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us so we can take appropriate steps to delete it.

## 10. International Users

Splits is operated from the United States. If you access the Service from outside the United States, your information will be transferred to and processed in the United States, where data protection laws may differ from those in your country. Where required, we use appropriate safeguards (such as standard contractual clauses) for cross-border transfers.

## 11. California Residents

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA), including the right to know what categories and specific pieces of personal information we collect, the right to request deletion, the right to correct inaccurate information, and the right not to be discriminated against for exercising your rights. We do not sell or share your personal information for cross-context behavioral advertising.

## 12. Changes to This Policy

We may update this Policy from time to time. If we make material changes, we will notify you by email or through the Service before the changes take effect. The date at the top of this Policy indicates when it was last updated.

### **13. Contact Us**

If you have questions or concerns about this Policy or our privacy practices, contact us at [privacy@splitshq.com](mailto:privacy@splitshq.com). For general support, contact [support@splitshq.com](mailto:support@splitshq.com).