

APPLICATION PRIVACY POLICY

Consumer Financial Data Protection & Plaid Integration Privacy Standard

Organization:	Learning Institute for Empowerment, LLC	Document Ref:	POL-PRV-2026-001
Platform Engine:	NEXENGINES Custom ERP Platform	Effective Date:	August 26, 2026
Application Scope:	LIFE Financial & Trade Empowerment App	Plaid Integration:	Plaid Link Integration Suite

1. INTRODUCTION & OVERVIEW

The Learning Institute for Empowerment, LLC (LIFE LLC), operating on the NEXENGINES technical platform, respects your privacy and is committed to protecting your personal and financial information. This Privacy Policy explains how we collect, use, store, and safeguard your data when you use our mobile and web applications (the "Application"), including when you interact with financial account aggregation tools powered by Plaid Inc. ("Plaid").

2. INFORMATION WE COLLECT

We collect information to provide, maintain, and improve our services, facilitate vocational trade training allowances, and streamline financial wellness workflows:

- **Account & Profile Information:** Full name, contact details (email address, phone number), mailing address, user credentials, and multi-factor authentication (MFA) tokens.
- **Financial Account Information via Plaid Link:** When you connect your bank account using Plaid Link, we collect financial institution identifiers, account balances, routing/account numbers, and historical transaction records provided directly by your financial institution through Plaid.
- **Technical & Usage Data:** Device identifiers, IP addresses, log files, system activity, and interaction timestamps captured via the NEXENGINES operational ledger.

Plaid Data Integration Safeguard: LIFE LLC uses Plaid Link to connect your financial accounts securely. We never store or access your bank login credentials (usernames/passwords). Plaid processes your financial login credentials in accordance with [Plaid's Privacy Policy](#).

3. HOW WE USE YOUR INFORMATION

Your data is processed strictly for legitimate operational and compliance purposes, including:

- Verifying account ownership and validating identity prior to financial account linking.
- Automating participant allowance distributions, living support payments, and tuition/scholarship metrics.
- Mitigating fraud, preventing non-sufficient funds (NSF) returns, and protecting against unauthorized system access.
- Ensuring compliance with grant accounting, federal reporting, and state vocational standards.

4. MULTI-FACTOR AUTHENTICATION (MFA) & PRE-LINK PROTECTION

To prevent unauthorized access to your account or third-party financial linking tools, LIFE LLC enforces step-up Multi-Factor Authentication (MFA via SMS OTP or TOTP Authenticator) directly on the Application **before** the Plaid Link interface is surfaced to the user. This ensures that only authenticated account holders can initiate financial connections.

5. DATA SECURITY & STORAGE STANDARDS

We implement robust, industry-standard security controls engineered directly into the NEXENGINES platform:

- **Data Encryption:** All data stored at rest is encrypted using AES-256 bit encryption. All data in transit across networks or APIs is protected via TLS 1.3 protocol.
- **Access Controls:** System access is governed by strict Role-Based Access Control (RBAC) and the Principle of Least Privilege. Only authorized personnel with an operational need can access system data.

- **Network Isolation:** Production databases are hosted in isolated Virtual Private Clouds (VPCs) with continuous audit logging.

6. INFORMATION SHARING & DISCLOSURE

LIFE LLC does **not** sell, rent, or trade your personal or financial information to third parties or advertisers. We share your data only in the following limited circumstances:

- **Service Providers:** Trusted technology partners (e.g., Plaid Inc. for financial connections, Stripe for payment processing, NEXENGINES for ERP infrastructure) operating under strict confidentiality and security mandates.
- **Legal & Regulatory Obligations:** When required by law, court order, regulatory audit, or to enforce our contractual terms and protect user safety.

7. YOUR PRIVACY RIGHTS & DATA RETENTION

Depending on your jurisdiction, you have rights regarding your personal information, including the right to access, correct, or request deletion of your stored data. You may also disconnect your linked bank account at any time through the Application settings, which revokes Plaid's active token connection.

8. CONTACT & PRIVACY INQUIRIES

Privacy Officer & Data Compliance Contact:

Learning Institute for Empowerment, LLC

Attn: Privacy & Information Security Department

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Technical Infrastructure Partner: **NEXENGINES** (nexengines.com)