

# Privacy Policy

## Your privacy is important to us

We know that privacy is important to you. It is also vital to our business. This Privacy Policy describes the types of **"Personal Information"** (information that is identifiable to a particular person) that may be collected (directly or through service providers) in connection with this Website and the Services offered through it. This Privacy Policy ("**Privacy Policy**") sets forth the guidelines we use in protecting your privacy. This Privacy Policy is considered part of the Website Terms and Conditions (the "**Terms**").

- **Cookies, Browser Information and Related Issues**

- When you visit the Site, we may receive certain standard information that your browser sends to every website you visit, such as the originating IP address, browser type and language, access times and referring website addresses, and other such information. This data may be used, among other uses, to improve the operation of the Site and to improve the security of the Site and Service by assisting in "authenticating" who you are when you access the Site or Service, particularly if you register for the Service and are issued or create a username and password.
- We may also receive additional information about your visit to the Site, including the pages you view, the links you click and other actions you take in connection with the Site and the Service. This data may be used, among other uses, to improve the operation of the Site and the Service.
- We may also receive additional technical data about the device being used to access the Site ("Device Data") (such as device IDs, device models, operating system version, application types and versions, browser type, language, and plug-ins, originating IP address, and time zone and geolocation information). Device Data may be used as part of Fiserv's security controls to uniquely identify the device, authenticate the user when accessing the Site, and shared (along with information about any fraudulent transactions using the device) with one or more third party service providers, which will compare and add the Device Data and fraud data to a database of similar device and fraud information in order to identify and block access to the Site by devices associated with fraudulent or abusive activity. We will not share with service providers any information that personally identifies the user of the device.
- Some parts of the Website use cookies, which are small data files placed on your device by the web server when you visit the Site. Most such cookies are "session" cookies that are only used for a specific period during which you are on the Website, but some may be "persistent" cookies that stay on your device and are read by the web server when you return to the Website (unless you erase them). The Site uses cookies to recognize your device and to store your preferences and other information on your device in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalized content on your later visits to the Site. These cookies may be linked to Personal Information about you, such as your email address. Cookies cannot and will not be used to deliver or run programs on your computer. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. However, if you choose to decline cookies, you may not be able to sign in or use other interactive features of the Site that depend on cookies.
- You may encounter our cookies or pixel tags on websites that we do not control. For example, if you view a web page created by a third party or use an application developed by a third party, there may be a cookie or pixel tag placed by the web page or application.
- Tracking Disclosure to California residents under Section 22575 of the California Business and Professions Code: With respect to personally identifiable information about an individual consumer's online activities over time and across different Web sites or online services when a consumer uses this Site, except as required by law: (1) parties other than the operator of this Site are not permitted to collect such information, and

(2) the operator of this Site does not collect such information (except any such information that is reasonably necessary to process and document user transactions, such as payment history). Therefore, this Site has no need to respond and does not respond to Web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of such information.

- **What Types of Personal Information We May Collect.**

In addition to the types of information described in section 1 above, we may also collect Personal Information about you. This information may include:

- Social Security number, date of birth, name, postal address, email address, telephone number, and other information that we can use to contact you, verify your identity, and manage risks, such as information maintained about you by identity verification services and consumer reporting agencies, including credit bureaus;
- bank account information (checking, money market or other direct deposit account, credit card account, or debit card account, including any required routing information), including loan numbers, routing numbers, account numbers and transaction history, for accounts that you designate for sending or receiving payments, fees, debits and credits for the Service;
- Billing account information, including billing account numbers which may be used to verify that only authorized users access the Services; username, password, secret questions and secret answers for resetting passwords, and other authentication credentialing used to verify that only authorized users access the Service; payment and other transaction information; and any Personal Information you directly submit it to us.

We do not knowingly collect any Personal Information from or about individuals under 18 years of age. Please do not submit such information to us, and as a parent or legal guardian, please do not allow your children to submit personal information without your permission.

- **How We May Collect Personal Information About You.**

We may collect Personal Information about you from the following sources:

- Enrollment applications, survey responses, and other electronic or paper forms that you fill out in connection with the Service;
- Your use of the Site and the Service, and your interactions with customer service, including information you enter or speak, and information transmitted by your computer, cell phones and other devices you use to connect to the Site or the Service; and
- We also collect Personal Information about you from others, such as individuals and financial institutions using the Service, credit bureaus, Affiliates or other companies (such as identity verification services and consumer reporting agencies).

- **How We May Use Personal Information About You**

We use Personal Information about you only as permitted by law, including but not limited to the following purposes:

- To complete transactions and render services authorized by you;
- Other everyday business purposes, such as to maintain your ability to access the Service, to authenticate you when you log in, to send you information about the Service, to

effect, administer and enforce transactions, to perform fraud screening, to prevent actual or potential fraud and unauthorized transactions, to verify your identity, to determine your transaction limits, to perform collections, to comply with laws, regulations, court orders and lawful instructions from government agencies or other competent authority, to protect the personal safety of subscribers or the public, to prevent and defend claims, to resolve disputes, to troubleshoot problems, to enforce our Service Terms of Use, to protect our rights and property, and to customize, measure, and improve the Service and the content and layout of the Site including pattern recognition, modeling, enhancement and improvement, system analysis, and Service performance analysis; and for marketing purposes - to offer products and services to you, although you may opt-out of receiving commercial email marketing messages from us by following the opt-out processes described in those messages.

- **How We May Share Personal Information About You.**

We share Personal Information about you only as permitted by law. For Personal Information that is nonpublic and that we collect in connection with a financial service ("Financial Personal Information"), U.S. federal law permits us to share the information only for the purposes shown in the following table:

Reasons we can share your Personal Information	Do we share?
For our everyday business purposes - such as to process your transactions, maintain your accounts, respond to court orders and legal investigations, and report to credit bureaus;	Yes
For our marketing purposes - to offer our products and services to you;	Yes
For Joint Marketing with other financial companies;	No
For our Affiliates' everyday	Yes

We may share certain Personal Information about you (including with a third party service providers, which will compare and add the Device Data and fraud data to a database of similar device and fraud information in order to identify and block access to the Site by devices associated with fraudulent or abusive activity. We will not share with service providers any information that personally identifies the user of the device. Identity and Location Verification: You authorize us to share your mobile subscriber details with a third party provider which will request your mobile carrier to use your mobile subscriber details for verifying your identity. Those details may include name, billing address, email, and phone number.

- **Other Important Information**

- Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our Affiliates, unless the law allows. We will not share information about your creditworthiness with our Affiliates except with your

consent, but we may share information about our transactions or experiences with you with our Affiliates without your consent.

- California: Under California law, we will not share information we collect about you with Nonaffiliates, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our Affiliates to the extent required by California law.

- **Definitions**

- Affiliates: Companies related by common ownership or control. They can be financial or nonfinancial companies. Our Affiliates include [examples]
- Nonaffiliates: Companies not related by common ownership or control. They can be financial or nonfinancial companies.
- Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- **How We Protect Personal Information About You**

To protect Personal Information about you from unauthorized access and use, we maintain physical, electronic, and procedural safeguards, including but not limited to security measures that comply with applicable federal and state laws. We also require our service providers to whom we may disclose the information to do the same. For Personal Information pertaining to borrowers and consumers, those safeguards are designed to protect the security and confidentiality of the information, to protect against anticipated threats and hazards to security and integrity of the information, and to protect against unauthorized access to or use of the information that could result in substantial harm or inconvenience. In addition to security measures such as collecting Device Data, Website registered users may be required to select and answer multiple security questions and may be required to enter additional information, including Personal Information, when registering for an account or a subsequent log in to the Website. All connections to our web server use SSL (secure socket layer) encryption to protect the transmission of information submitted to us.

- **Protection for Former Users.**

When you are no longer a user of this Website, we continue to protect, use, and share Personal Information about you as described in this notice and as required by law, including but not limited to for risk management, regulatory compliance, and audit purposes.

- **Changes to This Privacy Policy.**

We reserve the right to revise this policy in the future. Any changes to the policy will be clearly and conspicuously posted on this section of the Website. The revised version will be effective immediately at the time it is posted, unless a delayed effective date is expressly stated therein. You may (in our discretion) also be provided with an email notification of such amendments. You may (in our discretion) be required to affirmatively acknowledge or accept the revised Privacy Policy in order to continue using the Service. Any use of the Service after a notice of change (whether by Site posting, email, or express acknowledgment or acceptance) will constitute your express agreement to such changes. If we make any change in how we use Personal Information about you we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective.

- **Links to Other Websites.**

Our Website includes links to other Websites we may not control and whose privacy practices may differ from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any Website you visit.

- **Contacting Us**

If you have any questions about this Privacy Policy, you may contact us at the postal address or email address below:

**Global Lending Services LLC**  
PO Box 10437  
Greenville, SC 29603