

CrediVia, Inc. (“CrediVia”) is committed to protecting the privacy of personal information provided in connection with the delivery of its platform (“Platform”) made available at <https://loans.CrediVia.com> (the “Site”). This Privacy Policy provides an overview of the terms surrounding use of this information and discloses our information gathering and dissemination practices relating to the Platform. It does not apply to personal information that may be acquired by CrediVia in other ways.

## *Information Collected*

Users may be required to provide their name, e-mail address, and other information when registering and using the Platform. Users who are Borrowers (as defined in the Terms of Service) may provide a wide variety of personal financial information through the Platform, including social security number, for use by Lenders through the Platform to evaluate creditworthiness.

CrediVia may also require credit card and other payment information.

CrediVia uses "cookies" to identify users when they use the Site. A cookie is a data file that a web site writes to your computer when you visit the Site. The Platform may not be fully functional unless you accept use of Internet cookies. This information is used to identify who you are when you make a request to the Site. If you allow your browser to accept CrediVia cookies, a cookie is set and trusted when you return to the Site after visiting an external site.

CrediVia gathers information about its users collectively and logs IP addresses, session sources, and other data that track access to the Site. We analyze these logs to better understand aggregate behavior and to monitor performance of our Platform. The logs are analyzed to ascertain the overall aggregate trends they reveal about our users, but not as a means of tracking the behavior of individual users outside our Site. This information is used for the purposes of maintaining and improving the Platform.

In particular, our Site uses Google Analytics, a service which transmits website traffic data to Google servers. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand Site traffic and usage.

## *Use and Disclosure of Collected Information*

We do not use or share your personal information with others except as indicated in this Privacy Policy.

If you are a Borrower, CrediVia may disclose your personal information to Lenders so that Borrower’s Loan Requests can be evaluated. This disclosure will take place only pursuant to Borrower’s requests through the Platform. **NOTE: Lenders with whom you share information through the Platform may retain or use your information, whether or not you enter into a transaction with them. You should contact the Lenders directly concerning their privacy and information sharing practices.**

Certain other parts of the Service may allow you to transfer information and communicate with other users.

CrediVia may also use your personal information:

- to perform its other obligations related to your use of the Platform
- inform you of Platform issues
- alert you of new Platform features and enhancements
- enhance and test the Platform
- respond to your support issues, and/or
- notify you of upgrade opportunities, promotions, and special offers.

You agree that we may communicate with you via email and similar technologies for any purpose relating to the Site or the Platform.

We take diligent efforts to not divulge your information to unauthorized individuals, and to limit access to your information to authorized persons.

CrediVia may use aggregate information to determine the demographics of our users and to distribute statistics and general information about CrediVia. These demographics will always represent aggregate information and will not identify a specific user or Loan Request.

CrediVia may also disclose and use personal information:

- when we have your permission to do so; or
- to companies who work for CrediVia to provide one or more parts of the Platform or that provide related administrative functions (such as support services, web analytics, and fraud detection). These third parties may have access to your personal information; if they do, this access is only so that they may perform these tasks on our behalf and they are obligated not to disclose or use it for any other purpose; or
- when we believe in good faith that disclosure is reasonably necessary to (1) comply with a legal process or law, or to respond to a government request for information, (2) enforce our Terms of Service or other agreements, (3) respond to claims that any content on the Site or Platform violates the rights of third parties, or that otherwise arise from your use of the Platform, or (4) protect the rights, property, or personal safety of CrediVia, its users, or the public.

### *Security Measures*

We have implemented reasonable and industry standard security measures to help protect against the loss, misuse and alteration of the personal information under our control, including following standard web and cloud security guidelines and implementing data encryption techniques as needed. We also require employees to comply with information security safeguards, use encryption in the transmission of your Information between your system and ours, encrypt certain sensitive information when stored, and use firewalls and other intrusion detection and prevention controls to help prevent unauthorized persons from gaining access to your personal information. Additionally, CrediVia takes reasonable steps to ensure that its third-

party business partners, including its hosting partners, provide sufficient protection for personal information.

We regularly undertake security testing using industry standard testing tools for our Platform. Additionally, we regularly obtain penetration and security testing for our Platform performed by third parties. We use AWS hosted infrastructure and follow standard cloud security guidelines. Our Platform is based on high availability set up along with backup and monitoring services designed to ensure uninterrupted service. Our security architecture includes authentication and authorization features that enable access checks at each part of the user flow. Specific authorization permissions must be given to a user for such user to view or access any data. There is flexibility in defining which users can access what parts of the Platform, and what actions can be performed. Customers can give as well as revoke user access.

You acknowledge that no method of transmission over the Internet, or method of electronic storage, is 100% secure, and that we cannot guarantee absolute security. If you have any questions about security on our Site and Platform, you may contact us.

### *Children*

CrediVia does not knowingly allow persons under the age of eighteen (18) to sign up for an account on the Platform or to otherwise disclose any of their personal information to us. If you are under 18 years old, please do not use or access our Platform. We do not intend to collect information about persons under the age of 18. If we later obtain actual knowledge that a user is under 18 years of age, we will take steps to remove that user's information from our systems. If you are the parent or guardian of a child under 18 whom you believe has disclosed personal information to us, please contact us at [info@CrediVia.com](mailto:info@CrediVia.com) so that we may delete and remove the child's information from our systems.

### *Opt-Out*

We provide you the opportunity to opt-out of receiving certain marketing communications from us, by emailing us at [support@CrediVia.com](mailto:support@CrediVia.com). In addition, all marketing e-mails from CrediVia will provide you with the opportunity to unsubscribe from future marketing mailings. Even if you opt out of such mailings, however, we reserve the right to send you e-mail and other communications to disclose maintenance and other Platform-related issues.

### *Access to Account*

If you are a registered user of the Platform, you can change your account information through the account profile component of the Platform, if available, or otherwise by emailing us at [support@CrediVia.com](mailto:support@CrediVia.com). You may need to supply certain information so that we can try to verify that you have authority to modify this information.

### *Third-Party Sites and Services*

The Site and Services may contain links and other connections to other web sites, services or internet information. We have no responsibility for the privacy practices of other web sites and services, including the web sites and services of our advertisers or our business partners.

The fact that we may link to a web site or present an advertisement is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over any third party web site or service. Other web sites or services may place their own cookies or other files on your computer, collect data or solicit personal information from you. We encourage you to read the privacy policies or statements of other web sites and services associated with the Services.

#### *Sale of Company; Bankruptcy*

If we sell our company or otherwise transfer substantially all of our assets related to any Site or Service, we may disclose your personal information in connection with such sale or transfer. In that event, we will use diligent efforts to require the acquiring party to honor our then-current Privacy Policy, until the acquiring party provides you with notice of changes to the Privacy Policy.

In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how personal information is treated, transferred, or used.

#### *Legal Requirements*

We intend to protect your privacy to the fullest extent possible as described in this policy while also fulfilling our responsibility to uphold all applicable laws and regulations. Due to potential legal requirements and other possible circumstances, we cannot ensure that all of your private communications and other personally identifiable information will never be disclosed or accessed in ways not otherwise described in this policy. We may be compelled under law to disclose information to government or third parties under certain circumstances or third parties may unlawfully intercept or access transmissions or private communications. Further, we can, and you hereby authorize us to, disclose any information to law enforcement or other government officials that we, in our sole discretion, believe necessary or appropriate in compliance with the law and/or government requests.

#### *United States*

The Platform is hosted in the United States and is intended for use by residents of the United States only. If you are accessing the Site or Platform from outside the United States, please be advised that through your continued use of the Site or Platform, which is governed by U.S. law and this Privacy Policy, you are transferring your personal information to the United States and you consent to that transfer. The United States may not have the same data protection laws as your country.

## *For Vermont Residents, Entities or Real Estate*

By logging into the CrediVia platform, you accept this Privacy Policy and acknowledge and opt-in to have non-public personal financial information shared with others (Lenders) in conjunction with your Loan Request and the Services requested of CrediVia. You specifically consent to the disclosure of the same. This includes consent to share credit reports and/or creditworthiness information with affiliates; however, CrediVia does not currently pull credit reports as part of its loan application process.

## *Changes*

CrediVia will post any changes to this Privacy Policy on the Site. Your continued use of the Site and Platform constitutes your agreement to this Privacy Policy and any future revisions.

If you have any questions regarding this Privacy Policy, please [email us](#) or write to:

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