



edly Inc. Privacy Policy

Effective Date: January 31st, 2020

I. edly Inc.

edly Inc. (“edly” or “We” or “Us”) is the income share agreement (“ISA”) marketplace, connecting accredited ISA investors with ISA issuers such as colleges, skills academies and vocational schools. With one contact point, schools gain access to the entire market of ISA investors through the edly marketplace (collectively, our “Services”).

II. Overview

The purpose of this Privacy Policy (“Policy”) is to provide individuals (“You”) with information about how We collect, protect, use, and disclose Your personal information (“Information”) through Our website, www.edly.info (“Site”).

This Policy: (i) applies to edly; (ii) is in force as of the Effective Date listed above; and (iii) supersedes all prior versions.

III. Updates to this Policy

We may update this Policy at any time. We encourage You to review this Policy regularly to ensure that You remain up to date on Our privacy practices.

IV. Information That We Collect

A. Why We Collect

We collect Information from You in order to provide You with Our Services.

B. What We Collect

We collect the following categories of Information through Our Site, which may be collected directly by Us or through other sources:

1. Information You Provide To Us.

Identifying Information: When You visit Our Site, We may collect Your e-mail address if You provide it to Us voluntarily in order to contact You about the Services. While some items are optional, most are required for legal and security purposes. To sign up as a registered user of Our Services (“Registered User”) and access the areas restricted to Registered Users, You are required to create a user account and provide the following Information to us during the registration process: (i) Your name; (ii) Your e-mail address; and (iii) Your phone number. You may also voluntarily provide to Us Information about Your investment profile, such as: (i) income level; (ii) return expectations; (iii) net worth; (iv) investment experience; (v) desired investment term; and/or (vi) areas of investment interest.

Financial Data. Registered Users who use Our Services to make an investment in our offerings will be asked to provide certain financial data, such as Your bank account number and bank routing number. This Information is required to enable Us and Our banking partner, First Republic Bank, to utilize Your bank account to originate funds transfers and make subsequent investment disbursements to You.

2. Information We Collect About Your Interaction with the Site.

We collect additional Information about Your interaction with the Site without identifying You as an individual (“Anonymous Information”), by using cookies on Our Site. For example, We receive certain standard information that Your browser sends to every website You visit, such as: (i) Your IP address; (ii) browser type and language; (iii) access times; and (iv) referring website addresses. We may use Anonymous Information for any purpose in Our discretion. For clarity, Anonymous Information means information that is not associated with or linked to Your Information and does not permit the identification of individual persons. Further explanation about Our use of cookies is contained in Section VII, *Online Tracking and Cookies*, below.

V. How We Use and Share Your Information

We use Information collected from Site visitors to: (i) to operate the Site and provide the Services; (ii) to respond to Your requests and inquiries; (iii) to contact You and to communicate with You about Your use of the Services and Your Registered User account; (iv) to notify You about important changes to Our Services, such as updates or revisions to this Privacy Policy, security announcements or other similar messages; (v) to review Site usage and operations and to improve the content and functionality of the Site and Our Services; (vi) to provide You with information and materials about Our Services, including marketing and promotional offers; (vii) to address problems with the Services; (viii) to protect the security or integrity of Our Services, Our Registered Users and Our business, (ix) to communicate with You regarding any investments which You have made in Services offered on the Site; and/or (x) to tailor the Site to Our clients’ needs.

We will not sell or lease Your Information to any third party. Except as otherwise expressly provided in this Privacy Policy, edly will only share Your Information: (i) as required or permitted by law or regulation or as We believe in good faith that disclosure of such Information is reasonably necessary to: (1) satisfy any applicable law or regulation, (2) to respond to claims and/or to comply with a judicial proceeding, court order, or legal process served on us, (3) to protect and defend Our rights or property, and/or the rights or property of Our Registered Users, or third parties, as permitted by law, (4) to detect, prevent, or otherwise address fraud, security or technical issues; or (5) to enforce Our Terms of Use; and/or (ii) with Our service providers that provide certain services to maintain and operate the Services and certain features on the Services and compliance with anti-money laundering and sanctions laws and those service providers will be permitted to obtain only the Information they need to deliver the service. For example, We may use third party service providers to host the Site or to operate various features available on the Site, such as sending and managing email, analyzing data, and providing search results.

VI. How We Protect Your Information

We take securing Your Information seriously. We have implemented reasonable technical and organizational measures designed to deter unauthorized access to and use, destruction of, modification of, or disclosure of the Information We collect via the Site. We cannot ensure or warrant the security of any Information You transmit to us and You provide all Information via the Site at Your own risk. You are

responsible for maintaining the security of Your Registered User profile Information, including Your password and for any and all activities that occur under Your account. Do not share these items with anyone. We will never ask You to send Your password or other sensitive information to us in an email, though We may ask You to enter this type of information on the Site. If You are sharing a computer with anyone You should always log out before leaving a site or service to protect access to Your Information from subsequent users.

VII. Online Tracking and Cookies

edly uses cookies which are small text files stored locally on Your computer that help store user preferences and may be html files, Flash files, or other technology and other, similar products which track Your use of Our Site when You use Our Services.

We collect the following types of Information through Web tracking tools such as cookies to: (i) understand Site usage; (ii) help customize Our content or offerings on the Site; (iii) personalize Your experience on the Site (e.g., to recognize You by name when You return to the Site, save Your password in password-protected areas, or save Your online settings); (iv) analyze trends; and (v) accomplish other purposes related to Our management and administration of the Site.

VIII. Notice to California Residents: Your California Privacy Rights

This section only applies to California residents.

You have the right to request that We disclose to You, free of charge, certain data regarding: (i) the categories of Information that We have shared with third parties for their direct marketing purposes in the preceding calendar year; and (ii) the names and addresses of those third parties, if applicable to Our business practices. You may request this data by: (i) emailing Us at info@edly.info; or (ii) mailing your request to: edly Inc. 555 Pleasantville Rd., Suite N202, Briarcliff Manor, NY 10510. Please allow 30 days for a response.

IX. Children

Our Site is not intended to be used by anyone under the age of eighteen (18) (“Minors”), and We do not knowingly collect and/or use Information of Minors through Our Site. If You are a parent or guardian and believe that We inadvertently collected Information of a Minor, please contact us immediately at: info@edly.info or (914) 579-2455. We will then delete such Information.

X. Opt-out/Unsubscribe

You can opt-out of receiving unsolicited, promotional communications from Us by clicking the “unsubscribe” located at the bottom of a communication or by emailing Us at: info@edly.info.

XI. Updating Information.

You may review and request changes to any of Your Information that We collected through this Site by logging on to Your account or contacting us for assistance at info@edly.info.

XII. Consent

You agree to the entirety of the terms and conditions set forth this Policy by using/accessing Our Site, or otherwise providing Us with Your Information. If You do not agree to the terms and conditions as set forth in this Policy, please do not use this Site.

XIII. Contact Us

If You have any questions about this Policy or Our privacy practices generally, please contact Us at: info@edly.info or (914) 579-2455.