



FinFit Web Privacy Policy

General:

This Privacy Policy (“Policy”) describes the ways FinFit, LLC (“FinFit”, we, us) collects, stores, uses and protects information we receive from you or that you may provide when you visit www.finfit.com. FinFit may amend this Policy from time to time by posting a revised version on our website. By visiting www.finfit.com, you are accepting the practices described in this Policy.

Information Collected:

- Personal/Corporate information that users knowingly disclose to FinFit
- Information that is automatically generated by visitors as they interact with the web site.

Personal Information for FinFit Loans*:

FinFit will request and collect information in order to determine whether you qualify for FinFit Loans*.

Membership Information:

Upon account creation with FinFit, the following information may be requested:

- Your Name;
- Your Employer’s Name);
- Address;
- Phone number;
- Email address; and
- Preferences to establish a member profile.

FinFit may collect specific financial information from you concerning your bank account number and routing number for funding, transfer and payment purposes.

We may request additional information to help verify your identity and manage risk, including:

- Date of birth
- Social security number or other information. We may obtain information about our customers from, identity verification services or credit bureaus.

Patriot Act Compliance:

The USA PATRIOT Act is a Federal law that requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. You will be asked to provide your name, address, date of birth, and other information that will allow us to identify you. You may also be asked to provide documentation as proof of identification.

The following types of documentation may be requested:



- Driver's License;
- Passport & Country of Issuance;
- U.S. taxpayer Identification (ID) Number;
- Alien ID Card; and
- Any other government issued document evidencing nationality or residence.

Website Use Information:

The utilization of cookies, beacons, tags and scripts to track users' movements around the site are used by FinFit, LLC and our partners to analyze trends to improve site administration and user experience. Cookies are also used to remember member's settings and for authentication. Visitors/Members are able to control the use of cookies at the browser level. If cookies are rejected, the site still may be used, but some features or areas of the site may be limited.

Analytics / Log Files:

We gather certain information automatically and store it in log files. This information may include IP addresses, browser type, ISP, referring/exit pages, operating system, date/time stamp, and/or clickstream data. We use this data to improve our website to better serve our members.

Security of Member Information:

All personal identification data is encrypted at all times. FinFit stores and processes member information using our own secure data servers as well as third party servers located in secure data centers in the United States. Member information is protected by physical, electronic and procedural safeguards in compliance with applicable federal and state regulations. FinFit uses computer safeguards such as firewalls and data encryption using secure socket layer technology ("SSL") and authorizes access to customer information only for those employees who require it to fulfill their job responsibilities.

Use of Information

Our primary purpose in collecting customer information is to establish a safe, smooth, efficient and customized experience and allow customers to take full advantage of our products and services. FinFit uses customer information to:

- Provide services and support;
- Process transactions and send notifications regarding general operation of the service;
- Resolve disputes, collect fees and troubleshoot problems;
- Prevent potentially prohibited or illegal activities;
- Enforce the FinFit Loan Agreement;
- Customize, measure and improve our services;
- Update the content and layout of our website; and



– Compare information for accuracy and verify it with third parties.

Sharing of Information with Third Parties

We only use member information as described in this Policy. We may share member information with affiliates and business partners as well as third-party service providers under contract who support our business operations including member services, transfer or payment, fraud prevention, secure data storage and other similar services. In addition, you may have authorized FinFit to share data back to a service provider who you previously authorized to share data with FinFit. FinFit obtains assurances that these parties are properly licensed and regulated and only use member information in connection with the services they perform for FinFit or as you may have otherwise authorized. FinFit may, from time to time, exchange information with third parties to determine the feasibility of a partnership.

In addition, FinFit may disclose member information under the following circumstances:

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of FinFit's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding
- To third parties to market their products or services to you if you have not opted out of such marketing disclosures
- To fulfill the purpose for which you provide such information [i.e., if you give us an email address as part of a referral program, we will transmit the contents of that email and your email address to the recipients];
- Or any other purpose disclosed by us when you provide the information

FinFit may share member information with law enforcement, a State insurance authority, the Federal Trade Commission, self-regulatory organizations, or for an investigation on a matter related to public safety, to comply with Federal, State, or local laws, rules, and other applicable legal requirements; to comply with a properly authorized civil, criminal, or regulatory investigation or subpoena or summons by Federal, State, or local authorities; to respond to judicial process or government regulatory authorities having jurisdiction over the financial institution for examination, compliance, to report suspected illegal activity, to investigate any breach of our Loan Agreement, or other agreement with FinFit, or other purposes as authorized by law.

FinFit will only share a member's information with third parties as described in this Policy. FinFit will not share a member's financial information with other customers without permission.

Testimonials

We may display personal testimonials of satisfied members on our website in addition to other endorsements. With your consent we may post your testimonial along with your name and picture. If you wish to update or delete your testimonial, you may contact us at <https://finfit.com/Contact.aspx>.

Referrals

If you choose to participate in our referral program, we will ask for your contact's name and email address. We will send your contact an email inviting them to visit our website. FinFit stores this



information for the purpose of sending this email and tracking the success of the referral program. We may send additional emails to your contact in connection with services being offered by FinFit. Your contact may respond to us to request that we remove this information from our database.

Links to Third Party Websites

Our website includes links to other websites whose privacy practices may differ from those of FinFit. If you submit personal information to any of those websites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Opting Out or Editing Customer Information

To opt out of email correspondence from FinFit or make a change to customer information that FinFit has on file for you, please contact us at <https://finfit.com/Contact.aspx> or phone at 1-888-928-7242. You may also write to us at (272 Bendix Rd, Suite 525, Virginia Beach, VA 23452). We will respond to your request within 30 days. Some customer information must be retained for regulatory reasons.

Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, you may contact us at <https://finfit.com/Contact.aspx>. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements or for other business purposes.

Changes to the Policy and Contacting Us regarding the Policy

In the event FinFit modifies the Policy, we will update it on our website and post the new effective date. If we make any material changes we will notify you by email (sent to the email address specified in your account) prior to the change becoming effective. Any questions or concerns should be addressed to: (272 Bendix Rd, Suite 525, Virginia Beach, VA 23452). For customer service inquiries please call: 1-888-928-7242 or contact us via our Contact page: <https://finfit.com/Contact.aspx>

Your Data is Safe and Secure

Your privacy and security are extremely important to us. The data you provide to us is stored in accordance with our Policy and we use the highest level of encryption to ensure your information is safe and sound. The information we request is protected 24/7.



*FinFit Loans are issued by Celtic Bank, a Utah-Chartered Industrial Bank, Member FDIC.