

Privacy Policy

Effective Date: 06/01/2018

1. **Introduction and Scope of Online Privacy Policy:** We are committed to protecting the personal information we collect about individuals (e.g., applicants, borrowers, and merchants) participating in the POWERpay Program and have adopted policies, procedures, and processes designed to protect personal information from misuse, theft, or other loss. This POWERpay Program website privacy policy (the "Online Privacy Policy") outlines our information collection practices at our websites, including, but not limited to, www.GetPowerPay.com, (collectively, our "Website"). This Online Privacy Policy applies to Personally Identifiable Information collected through our Websites (defined in Section 2 below) but does not apply to information, including personally identifiable information, collected from third-party sources (such as consumer reporting agencies) or that you reveal or post in any public forum on our Website, websites that link to or from our Website, or any other website.
2. **Personally Identifiable Information:** "Personally Identifiable Information" is any information collected through our Websites that is reasonably likely to identify a specific, unique individual. Personally Identifiable Information collected through the site may include, but not be limited to, an individual's name, address, e-mail address, income, financial and banking information (including banking account information and payment card data), Social Security number, telephone number, or date of birth.
3. **Important Information Regarding Use of the Website:** POWERpay, LLC and the federally-insured, federal or state chartered financial institutions participating in the POWERpay Programs (the "Funding Participants") (collectively, "we" or "us") own the information we collect on the Website. The Website contains links to other websites. We do not control and are not responsible for the content, security, and privacy practices of such websites. This Website is intended for visitors located in the United States. This Website is governed solely by the federal and state laws in the United States. Users from the European Union are advised not to disclose any Personally Identifiable Information to us. Information submitted to this Website is housed on servers located in the United States. By using the Website, you agree to the terms of this Online Privacy Policy. If you do not agree to the terms of this Online Privacy Policy, do not use the Website. Furthermore, by using this Website, you agree to the application of United States law and consent to the use and disclosure of your information consistent with this Online Privacy Policy.
4. **Information Collected on the Website:** We collect Personally Identifiable Information at various times when you use our Website. Some of the places where we collect such information includes, but is not limited to, the following:
 - Emails, contact forms, questionnaires, and other forms you submit to us;
 - Your applications and transactions with the POWERpay Programs, including those involving the Funding Participants;
 - Requests for pre-qualification for credit; and
 - Requests regarding qualified merchants.Additionally, each time you visit the Website, the web server may automatically collect certain types of non-Personally Identifiable Information. Some examples of the non-Personally Identifiable Information we may automatically collect include:
 - Information about your Internet service provider, browser, operating system, and device;
 - Cookie information to recognize when you are visiting the Website;
 - Data related to your location at the time of accessing our Website, and
 - Beacons to know if a certain page was visited or an email was opened.
5. **Cookies:** An HTTP cookie (also called web cookie, Internet cookie, browser cookie or simply cookie) is a small piece of data sent from a website and stored on your computer by the web browser you use while browsing the Internet). We use cookies to collect certain types of non-Personally Identifiable Information to recognize you when you are visiting the Website. In addition, we use cookies in connection with Google Ads so that Google can show ads for our products to you before you visit or

after you leave our website. Google's Adwords technology may recognize a cookie that our website has sent to your browser during a past visit by you to our website and use the cookie information to show you ads for our products or similar products. You can opt out of this use of cookies by visiting Google's [Ads Settings](#).

6. Use of Information Collected on the Website: We may use your Personally Identifiable Information for the following purposes:

- To process transactions your request;
- To assess your creditworthiness when you apply for credit or to pre-qualify you for credit;
- To manage and service loans or other accounts you have with us;
- To communicate with you about your POWERpay Program loans or credit accounts and the use of our Website;
- To advise you of promotions, sales, or other special opportunities;
- To market goods or services offered by:
 - POWERPAY, LLC, or its affiliates and subsidiaries;
 - Funding Participants, or their affiliates and subsidiaries;
 - merchants participating in the POWERpay Programs; or
 - other unaffiliated third-parties;
- To comply with the law, regulatory requirements, legal subpoena or other litigation process, or to enforce our Terms of Use;
- As directed or authorized by you; or
- As permitted by law.

We may use non-Personally Identifiable Information, including, but not limited to, aggregate or anonymized information for any purpose consistent with law.

7. Disclosure of Personally Identifiable Information to Third-Parties: By accessing our Website, you authorize us to disclose your Personally Identifiable Information to affiliated and unaffiliated third-parties as follows:

- To companies in our corporate group;
- To third parties, including Funding Participants, financial services providers (such as credit bureaus, securities broker-dealers, and insurance companies), companies with which we have joint marketing agreements, merchants and retailers, companies that help market our products, and non-profit organizations;
- To selected businesses, such as online and offline advertisers, so they can market products and services to you;
- As necessary to comply with the law, regulatory requirements legal subpoena or other litigation process, or to enforce our Terms of Use;
- As directed or authorized by you; or
- As permitted by law.

California Residents: Other than as required or permitted by law, we will not disclose Personally Identifiable Information about you to other financial service providers with which we have joint marketing agreements, unless you authorize us to do so.

8. Personally Identifiable Information of children: We do not knowingly solicit or collect Personally Identifiable Information about children under the age of 18. Our Website is not designed for or directed to children under the age of 18. If we become aware that a child under the age of 18 has provided Personally Identifiable Information to us, we will delete the information from our records. If you become aware of any Personally Identifiable Information we collected from children under 18, please contact us at service@GetPowerPay.com.

9. Our security safeguards: We and our third-party service providers use reasonable technical, administrative, and physical safeguards to secure your Personally Identifiable Information. We take steps to protect the confidentiality of Personally Identifiable Information, including, but not limited to, Social Security numbers, and prohibit the unlawful disclosure of such information. We limit access to such Personally Identifiable Information. Although we work to protect your Personally Identifiable

Information, you should be aware that no technology is perfect and that there is always some risk involved in transferring data over the Internet, particularly if you send information to us through an unsecured means, such as email.

10. Reviewing collected information, sharing and opting out:

Information retained in our active databases. If you would like to review or correct any Personally Identifiable Information we have retained about you in our active databases, please send an e-mail request to: service@GetPowerPay.com.

Opting out from our solicitations. If you receive a marketing e-mail from POWERPAY, LLC or a POWERpay Program relating to any offer or promotion and wish to be removed from future email solicitations, you will have the option to do so. If you opt out, the only future email communication you will receive from us will be (a) transactional or relationship messages, such as activity alerts and payment reminder messages; (b) in response to questions from you; or (c) to resolve any customer service issues you may have reported.

Information relating to services provided by our service providers and lenders. If you need help accessing your information related to a service provided by one of our service providers or information held by your lender, we will assist you by referring you to the appropriate third party. Please contact us for that information by submitting an e-mail request to service@GetPowerPay.com.Limiting information Sharing. You may limit when we may share information about you. You may exercise one or more of your opt-out choices described. Call us toll free at 800-397-4485 or write to us at POWERpay Attn: Information Sharing Opt-Out, 1121 N. Bethlehem Pike Suite 60-147 Spring House, PA 19477. If you write to us, please include your account number, contact phone number, and full name on the account. If you have a joint account, your opt-out applies to every person on the account. If you have multiple accounts with us, you must opt-out separately for each account.

11. Changes and revisions to this Online Privacy Policy: By accessing our Website, you acknowledge that we have the right to revise and amend this Online Privacy Policy. We will post any changes to this Online Privacy Policy here so that you will always be aware of our privacy practices. Please refer back to this Online Privacy Policy regularly. Your continued use of our Website following our posting of any such changes will mean that you accept such changes.

12. California Do Not Track Policy: Some browsers have a “do not track” feature that may transmit “do not track” signals to websites and other online services with which the browser communicates. At this time, we do not currently participate in any “Do Not Track” (DNT) systems that would allow us to respond to such browser “do not track” signals.

13. Your California Privacy Rights: If you are a California resident, you have the right to request and receive information regarding the disclosure of your Personally Identifiable Information by us or any of our affiliates to a third party for its direct marketing purposes. Any such requests for information can be made by sending an email to service@GetPowerPay or calling us toll free at 800-397-4485.