

## PRIVACY POLICY

**(Last Updated February 2023)**

As your financial privacy is very important to us, this notice discusses DC Loans and its subsidiaries and affiliates' (collectively, "DC Loans," "DCL," "we," "us," or "our") privacy practices with respect to guarding the confidentiality and security of your personal information and the information you submit through this website.

If we decide to change our privacy policy, we will post those material changes to this privacy policy, the homepage, any notices we provide, other places we deem appropriate, and as required by applicable law so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy policy at any time, so please review it frequently.

### **What information does DCL collect through its website?**

On our website, we collect personal information about you that you willingly provide to us for purposes of generating consumer loan offers and other financial products and services. This information includes your name, address, email address, state of residence, phone number, social security number, amount of unsecured credit obligations, your IP address, your website interaction on the website, and how you heard about us. DCL wishes to convey to its users that the only types of communications that are sent out are service-related emails that are in response to a user's online inquiry requesting a consumer loan or other financial product or service. Users cannot opt out from receiving these service-related emails while engaged in ongoing transactions with DCL. If your personal information changes, or if you no longer desire our products or services, you may contact us at the contact information provided at the end of this privacy policy to correct, update, delete, or deactivate your personal information.

We also may collect information that is not personally identifiable. Our website automatically collects clickstream information about your visit. This can include the address of the website from which you originated before visiting our website, the pages you visit on our website, and the browser you use.

If you apply for a loan or other financial product or service, we will collect additional personal information about you, including information about your education, home address, employment, financial and outstanding credit obligations, creditors, life events, and financial condition.

### **How does DCL use the information it collects?**

DCL does not disclose any information that it collects through its website with any other person or entity except as permitted by law and indicated in our privacy policy. The personal information we collect is initially used to evaluate your eligibility and underwrite you for a consumer loan. After evaluating your application, we will use the information you submitted to contact you about consumer loans and other financial products and services, explain how DCL can help relieve your credit burdens through a consumer loan, or suggest alternate options if DCL is unable to assist you.

We may disclose personal information about you to: (1) make a loan to you or broker a loan through third party lenders and lending networks, like our lending partners; or (2) service, collect, and maintain your account with us or the lenders or their assignees that make a loan to you. Thus, we may disclose personal information about you with your creditors, credit reporting agencies, and with other parties

that help us to service and maintain your account. We may receive personal information about you from other parties such as credit reporting agencies, third parties who assist in identifying prospective consumers, data brokers, social media and marketing sources, or your creditors.

DCL uses Google Analytics reporting to gather information on visitors to our website. We do not facilitate the merging of personal information with non-personal information previously collected from displaying advertising features that is based on the DoubleClick cookie unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. We have implemented Google Analytics Demographics and Interest Reporting to gather information such as age, gender, and interests through our website. DCL uses this information to further enhance our visitors' experiences on our website and to support display advertising. Using the Ads Settings, visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads.

As necessary, we may share non-personal information with our trusted third-party service providers, such as the corporations that manage or host our website, to perform services on our behalf. They typically use non-personal, anonymous information – like clickstream information regarding visit duration – that isn't identifiable with a particular visitor to further improve the website.

We reserve the right to disclose your personal information as required to complete the requested transaction, service your account, as required by law or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our website.

## **Cookies**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this website. We do not link the information we store in cookies to any personal information you submit while on our website.

We use persistent cookies. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided by your Internet.

We set persistent cookies to track and target the interests of our users to enhance the experience on our website. If you reject cookies, you will not have any difficulties using our website.

Some of our business partners/affiliates use cookies on our website. We have no access to or control over these cookies. This privacy policy covers the use of cookies by DCL only and does not address the use of cookies by any other party.

At this time, DCL does not respond to Do Not Track (DNT) signals. You may have additional choices available to you with regards to some online behavioral advertising cookies. Please visit the Digital Advertising Alliance at <https://optout.aboutads.info/?c=2&lang=EN> or the Network Advertising Initiative at <https://optout.networkadvertising.org/?c=1> for more information.

## **Pixels**

Pixels allow third parties to collect browsing information across sites and helps us to make the ads and content displayed more relevant to users. The Pixels also allow us to provide information to third parties

about how viewers engage with content or advertisements and how to reach the most interested audience.

Pixels collect IP address and location, date and time stamp, user agent, cookie IDs (if applicable), URL, time zone, and other browser-level data or cookie data.

Pixels for ad or content optimization is only used after such data has been aggregated with other data collected from advertisers or other third parties.

We may share aggregate statistics, metrics, and other reports, such as the number of unique user views, demographics about the users who engaged in ads or content, conversion rates, and date and time information.

### **Does DCL have safeguards in place to protect my personal information?**

We restrict access to your personal information only to those employees who need to know that information to service and maintain your account with us. We also maintain physical, electronic, and procedural safeguards that comply with federal requirements to guard your personal information. All employees are trained on information security expectations to ensure the confidentiality and proper usage of data and the systems protecting the data.

Please be aware that 100% security is not achievable and despite our best efforts, we cannot anticipate every possible threat to personal information. By using our website, you acknowledge that such use is not risk-free.

### **California Privacy Notice**

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the privacy policy of DCL (also referred herein as “business”) and applies solely to visitors, users, households, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act as amended from time to time (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In some cases we also collect “sensitive personal information.” Sensitive personal information includes:

- Any personal information that divulges any of the following:
  - A consumer's social security, driver's license, state identification card, or passport number.
  - A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
  - A consumer's precise geolocation.

- A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.
- The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.
- A consumer's genetic data.
- The processing of biometric information for the purpose of uniquely identifying a consumer.
- Personal information collected and analyzed concerning a consumer's health.
- Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

In particular, the chart below depicts the categories of personal information and sensitive personal information relating to consumers we have collected within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (18 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation,	YES

Category	Examples	Collected
	veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO for customers YES for certain employees
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

Category	Examples	Collected
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
L. Sensitive Personal Information	Social security numbers, driver's license, state identification card, or passport number, account log-in in combination with any password allowing access to an account	YES

Personal information and sensitive personal information do not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

Note that the personal information that we collect may not be subject to your rights under the CCPA because it is personal information covered by or collected under industry specific privacy laws, including, but not limited to:

- the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
- the California Confidentiality of Medical Information Act (CMIA);
- the Fair Credit Reporting Act (FCRA);
- the Gramm-Leach-Bliley Act (GLBA);
- The California Financial Information Privacy Act (CalFIPA); and
- the Driver's Privacy Protection Act of 1994.

**Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website ([www.dcloans.com](http://www.dcloans.com)). For example, from submissions through our website portal or website usage details collected automatically.

- From third parties that interact with us in connection with the products and services we provide. For example, from affiliate marketers who place ads and forward activity to us or from consumer reporting agencies (“CRA”) and identity and fraud verification vendors.
- Information that is publicly available online or elsewhere.
- Employees and job applicants.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us assist you in obtaining a consumer loan.
- To provide you with information, products or services that you request from us or our partners.
- To provide you with email alerts, newsletters and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To assist you in identifying appropriate resources if we cannot serve you for any of a number of reasons including, but not limited to, inability to operate in the state of request or inability to qualify for a consumer loan.
- To provide a third party or affiliate with qualified leads for a program that they may administer
- To improve our website and present its contents to you.
- For testing, research, analysis, and product development.
- To conduct audit, compliance, or other legal work associated with our business.
- To perform financial reporting and accounting and other general business administration.
- To assess third party vendors and services providers.
- As necessary or appropriate to protect the rights, property or safety of us, our customers, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

### **Disclosing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We may also disclose your personal information to a third party for a commercial purpose. When we disclose personal information for a commercial purpose, which may include providing your information to a provider which can assist you, we have a compensatory relationship which requires the recipient to abide by data privacy regulations and not use it for any purpose except as described.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business and/or commercial purpose:

1. Category A: Identifiers.
2. Category B: California Customer Records personal information categories.
3. Category C: Protected classification characteristics under California or federal law.
4. Category D: Commercial information.
5. Category E: Biometric data.
6. Category F: Internet or other similar network activity.
7. Category I: Professional or employment-related information.
8. Category K: Inferences drawn from other personal information.

We disclose your personal information for a business and/or commercial purpose to the following categories of third parties:

- Our affiliates.
- Our credit facility lenders.
- Lenders and lending networks.
- Loan buyers.
- Service providers.
- Vendors.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- Other third parties including marketers.

### **Use and Disclosure of Sensitive Personal Information**

In some circumstances, we collect, use, or disclose your sensitive personal information for the purpose of inferring characteristics about you. When this is done, we will only use and disclose your sensitive personal information for limited business purposes including:



- To help ensure the security and integrity of your personal information.
- To perform services or offer products on our behalf or our partners' behalves, such as processing applications, verifying customer information, processing payments, and servicing credit products.
- Undertake activities to verify or maintain the quality or safety of our products and services.

### **Retention of Personal Information**

The period for which we retain your personal information is based on the nature of our relationship with you and the specific personal information we have obtained. For example, we retain customer loan records for 7 years from the time the account is closed. However, we will retain customer records for longer if a customer files for bankruptcy or files any sort of legal action. We will only retain your personal information for so long as is legally required and/or reasonably necessary and proportionate to the business purposes for which your personal information was collected.

### **Your Privacy Rights**

If you are a California resident, subject to applicable law, you have the following rights under California law with respect to your personal information, to the extent your personal information is not already subject to federal law and the required privacy and security measures applied under federal law:

- **Right to Know.** You have the right to request what personal information we collect, use, disclose, and/or sell, as applicable.
- **Right to Correct.** You have the right to request that we correct any inaccurate personal information that we maintain about you.
- **Right to Delete.** You have the right to request the deletion of your personal information that is collected or maintained by us.
- **Right to Opt-Out of Sale and Sharing.** You have the right to direct us to not sell your personal information at any time. In addition, you have the right to direct us to not share your personal information. The CPRA defines "sharing" as communicating personal information to a third party for cross-context behavioral advertising. However, we have not sold or shared your personal information in the preceding 12 months, nor do we currently sell or share, or intend to sell or share personal information in the future. In addition, we do not collect, and therefore, do not sell or share the personal information of minors. For information on how we may share your personal information that is subject to the GLBA and FCRA, please see our [Privacy Notice](#).
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not use or disclose your sensitive personal information except as permitted by applicable, such as when necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- **Right to Data Portability.** You have the right to request a portable version of your data.
- **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights described above.

You may authorize someone to exercise the above rights on your behalf. In order to have a third party exercise rights on your behalf as an agent, the third party would need to fill out the same forms as the consumer and have a notarized letter authorizing them to act on your behalf. The agent would also need to be able to have sufficient data to verify your identity as well.

The above rights are subject to our being able to reasonably verify your identity and authority to respond to these requests. These rights are also subject to various exclusions and exceptions under applicable laws. If you are a prospective consumer in order to verify your identity, you must provide first and last name, state of residence, phone, physical address and email. If you are a current customer, you must also provide the social security number or other identifying account number in addition to the items required for prospective consumers.

If you are a California resident and wish to seek to exercise these rights, please reach us in one of the following ways:

- Call us at [888-878-3295](tel:888-878-3295)
- Email us at [privacy@dcloans.com](mailto:privacy@dcloans.com)
- Our website at [www.dcloans.com](http://www.dcloans.com) and “clicking” on the “CA Do Not Sell My Info” link at the bottom of our website.

For more information regarding this privacy policy, or if you have any questions or concerns, you may contact us in the following ways:

- Call us at [888-878-3295](tel:888-878-3295)
- Email us at [privacy@dcloans.com](mailto:privacy@dcloans.com)
- Our website at [www.dcloans.com](http://www.dcloans.com)

### **Notice of Right to Opt-Out**

You have the right to direct DCL not to sell your personal information and to refrain from doing so in the future. If you wish to opt-out of such sales, please do so in one of the following ways:

- Call us at [888-878-3295](tel:888-878-3295)
- Email us at [privacy@dcloans.com](mailto:privacy@dcloans.com)
- Our website at [www.dcloans.com](http://www.dcloans.com) and “clicking” on the “CA Do Not Sell My Info” link at the bottom of our website.

### **Contact Us**

If you have any questions or concerns about this privacy policy, please send them to us by emailing [privacy@dcloans.com](mailto:privacy@dcloans.com) or call us at [888-878-3295](tel:888-878-3295). If you have technical difficulty using our website, please contact our Webmaster at [support@dcloans.com](mailto:support@dcloans.com).