

PRIVACY POLICY

The words “we”, “us”, and “our” mean Pepper Pay, LLC.

If you inquire about, apply for, or have a product or service with us, please review our Privacy Policy, which applies as described in this Privacy Policy (the “**Privacy Policy**”).

We will collect, store, use and protect any personal information that you share with us. We will not share your information with anyone, except as described in this Privacy Policy.

This Privacy Policy explains what personal information we collect and how we use and share any such personal information. It also explains what you can do to limit the use and sharing of your personal information.

Personal information generally means information that identifies you or your device, and other information we associate with it.

We reserve the right to change this Privacy Policy at any time, and if we do so, we will post changes and updates to this page. Please refer to this Privacy Policy periodically to inform yourself if changes have been made.

Please read this Privacy Policy carefully and understand what we do.

PERSONAL INFORMATION WE MAY COLLECT AND SOURCES WE MAY USE

CONTACT INFORMATION

We may collect the following information: your name, social security number, date of birth, home address, email address, phone number, government-issued photo ID (driver’s license or passport).

We may collect this information from you or your representatives, during the enrollment process or from the social network if you contact us via a social media platform.

DIGITAL INFORMATION

We may collect the following information: information regarding your computer and mobile phone, such as your device’s manufacturer, model number, and mobile phone plan carrier, information regarding your IP address, including your geolocation data, your activity and behavior on our website, how you were referred to our website or which link you followed to the Apple App or Google Play store, a list of your contacts from your phone’s operating system, and/or your communications.

We may collect this information through your use of our website (“Site”) or mobile app (“App”), from your internet service provider or through web beacons, customized links, cookies & other session trackers, if you choose to share your contacts with us, or during your interaction with us via the in-App chat, email, phone, or Site.

FINANCIAL INFORMATION

We may collect the following information: bank account numbers, debit card and credit card numbers, balances, transaction history, credit score and other credit history data.

We may collect this information from you or during your interactions with our App and Site, our bank partners, from a credit bureau, through a payment processor or a third-party secure access tool.

EMPLOYMENT INFORMATION

We may collect the following information: information about your occupation, salary, job title, source of income, annual income, how often you get paid or information about your employer.

We may collect this information from you directly, during the enrollment process or during your interactions with our App and Site, or from a third-party service provider.

COMMERCIAL INFORMATION

Commercial information is information about your interest in a particular product or service, your purchasing or consuming tendencies, receipts or records for products or services, and/or your feedback and opinion about us.

We may collect this information from you or sort it according to your preferences on our website or from user research after your participating in a questionnaire or survey.

BIOMETRIC INFORMATION

We may collect the following information: voice recordings, facial recognition information, such as an image of your face, and information on other body parts.

We may use the following sources to collect the information: App, Site, customer service and communications platform vendors.

COOKIES

“Cookies” are small data files transferred by a website to your computer's hard drive. We or our service providers send cookies when you surf our Site, or sites where our ads appear, request or personalize information, or register yourself for certain Services. Accepting the cookies used on our Site, sites that are “powered by” another company on our behalf, or sites where our ads appear may give us access to information about your browsing preferences, which we may use to personalize and enhance your experience. Cookies are typically classified as either “session” cookies or “persistent” cookies.

Session cookies do not stay on your computer after you close your browser.

Persistent cookies remain on your computer until you delete them, or they expire.

Generally speaking, web browsers automatically accept cookies by default. That being said, you can typically prevent cookies or selectively accept cookies by adjusting the preferences in your browser. If cookies are not accepted, there may be some features of our Site that will not be available, and some websites/pages/content may not display properly.

We do not store passwords or any other information about a visitor in a cookie that would identify them, locate them, or determine their preferences or their financial activity. Aggregated customer information may help us to assess the performance of our Site and develop strategies to maximize utility. This information may be provided to other companies, including but not limited to third-party advertisers. This information does NOT include any personal details that can be used to identify individuals.

HOW CAN WE USE AND SHARE YOUR PERSONAL INFORMATION?

We use the Personal Information we collect to provide our products and services; to communicate with you; to create and market products and services; to prevent, detect and investigate fraud, hacking, infringement, or other suspected or actual misconduct or crime; for other business purposes and as otherwise allowed by law.

We also use Personal Information to the extent necessary to comply with our procedures, legal requirements and to prevent imminent harm to persons or property.

Your Personal Information allows us to verify your identity, communicate with you and enforce our agreements with you, as well as secure the best possible experience for all our customers by ensuring compliance with applicable US state and federal laws and our own policies. We may also use Personal Information to improve and enhance our offers to you.

We use your Personal Information to process and resolve disputes you initiate, to resolve errors and unauthorized transfers, to verify your identity in certain circumstances and for customer service training and quality assurance.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION

- For our everyday business purposes— such as to process your transactions, to maintain your account(s), to respond to court orders and legal investigations, or to report to credit bureaus.
- For our marketing purposes— to offer our products and services to you.
- For joint marketing with other financial companies (excluding mobile phone numbers and SMS opt-in/consent for marketing or promotional purposes).
- For our affiliates' everyday business purposes— information about your transactions and experiences.
- For our affiliates' everyday business purposes— information about your creditworthiness.
- For our affiliates to market to you (excluding mobile phone numbers and SMS opt-in/consent for marketing or promotional purposes).
- For non-affiliates to market to you (excluding mobile phone numbers and SMS opt-in/consent for marketing or promotional purposes).

SMS / Mobile Messaging Notice: We do not share, sell, rent, or otherwise disclose mobile phone numbers or SMS opt-in consent to third parties or affiliates for their marketing or promotional purposes. We may share information with service providers that help us operate our messaging program solely to deliver messages and provide the service.

WE MAY DISCLOSE YOUR PERSONAL INFORMATION TO THE FOLLOWING ENTITIES:

- Our affiliated and subsidiary companies (excluding mobile phone numbers and SMS opt-in/consent for their marketing or promotional purposes).
- Non-affiliated third parties that perform services, such as marketing or market research, on our behalf, provided that mobile phone numbers and SMS opt-in/consent are not shared for their own marketing or promotional purposes.
- Non-affiliated third parties under contract that service, maintain, or process your transactions and accounts.
- Non-affiliated third parties as permitted or required by law to defend our rights or enforce a contract, or to cooperate with government agencies or regulators, (including for tax purposes), securities exchanges, self-regulatory bodies and law enforcement officials

(for example, for reporting suspicious activity or transactions, complying with a subpoena). Non-affiliated third parties to protect against actual or potential fraud or unauthorized transactions, and to protect the security of our records and systems, unless prohibited by law.

- Non-affiliated third parties at your direction or for which you provide your express consent (for example, banking or financial institutions and professional service providers), (note that SMS opt-in/consent is not shared for third-party marketing or promotional purposes).

Our service providers are obligated to keep the Personal Information we share with them confidential and use it only to provide services specified by Pepper Pay. We require our service providers to have administrative, technical, and physical safeguards and apply them during our cooperation.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will maintain the information that is necessary to enable us to provide the requested service only for as long as it takes us to provide any such requested service. We may still need to keep your Personal Information to ensure that our systems reflect your preferences. We may keep records of any transactions you enter into on the Site or the App for a minimum of six years from the end of our relationship with you. We may keep other information about you to the extent necessary to comply with applicable laws and to further legitimate business needs.

PROTECTING YOUR PERSONAL DATA

To protect your Personal Information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We maintain physical, electronic and procedural safeguards designed to protect your Personal Information from unauthorized access or intrusion. We regularly adapt these controls to respond to changing requirements and advances in technology. We limit access to the Personal Information to those who require it to develop or support our products and services, who need such access in connection with providing products or services to you, or for other legitimate business purposes.

All Personal Information is securely stored on our servers in the United States. We employ the highest in industry standards to protect your Personal Information.

Although Pepper Pay utilizes the highest reasonable levels of data security in the industry, we cannot guarantee the security of Personal Information or other information provided to us. By using our services, you acknowledge and agree that we make no such guarantee, and that you use our systems at your own risk.

COMPROMISE OF PERSONAL INFORMATION

We regularly review our operational and business practices for compliance with corporate policies and procedures governing the security, confidentiality, and quality of our information.

However, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security of your Personal Information.

We shall not be liable for the transfer of any Personal Information resulting from loss or distribution of data, the delineation or corruption of storage media, power failures, natural phenomena, riots, acts of vandalism, sabotage, terrorism or any other event beyond our control.

In the event that Personal Information is compromised as a result of a breach of security, we will promptly notify those people whose Personal Information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy by email, or as otherwise required by applicable law.

Remember! You also should protect your Personal Information. Please safeguard your username and password for your Account and do not share them with others.

NOTIFICATION PROCEDURES

We will provide notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our App or Site, as determined by Pepper Pay in its sole discretion. We reserve the right to determine the form and means of providing notifications to you.

MINORS

This Site is not directed at individuals under the age of majority in their respective jurisdiction, and we do not knowingly collect Personal Information from any individual under the age of majority in their respective jurisdiction at this Site or the App.

LINKS TO OR FROM OTHER WEBSITES

Pepper Pay is not responsible for the practices employed by websites linked to or from our App or Site, nor the information or content contained therein. Please remember that when you use a link to go from our App or Site to another mobile app or website, our Privacy Policy is no longer in effect. Your browsing and interactions on any other mobile app or website, including those that have a link on our App or Site, is subject to that mobile app's or website's own rules and policies. Please read over those rules and policies before proceeding.

HOW CAN I LIMIT THE SHARING MY PERSONAL DATA?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness.
- affiliates from using your information to market to you.
- sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing. See the Policy for more on your rights under state law.

Please note: When you are no longer our customer, we continue to share your Personal Information as described in this Privacy Policy. However, you can contact us at any time to limit our sharing.

Please note: We may contact our existing customers by mail, telephone, or email to offer additional financial products or services, including products and services offered by nonaffiliates that we believe may be of interest to you. You may direct us not to send you such offers.

To limit or “opt-out” of sharing your Personal Information with our affiliated companies for marketing purposes, information about your creditworthiness and for non-affiliates to market to you please contact us by calling **+1 786-358-9338** or by emailing Pepper Pay at support@pepperpay.com.

OTHER IMPORTANT INFORMATION

NOTICE TO CALIFORNIA RESIDENTS

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) allows California residents, upon a verifiable consumer request and subject to applicable exemptions, to request that we give you access, and (if technically feasible) in readily usable form, to the specific pieces and categories of Personal Information that we have collected or shared about you. California residents also have the right to submit a request for deletion of Personal Information under certain circumstances that Pepper Pay is not otherwise entitled to maintain.

A California consumer may, for no fee, make the following verifiable requests to a business collecting their Personal Information:

- request to know categories of Personal Information collected and disclosed.
- request to know specific pieces of Personal Information collected.
- request to delete their Personal Information.

To submit a request under the CCPA, please contact us by calling **+1 786-358-9338** or by emailing Pepper Pay at support@pepperpay.com. For your protection, we will need to verify your identity using the Personal Information associated with your Account before fulfilling your request. Government identification may be required. We will try to comply with your request as soon as reasonably practicable and consistent with applicable law, which may take up to 45 days following verification of your identity. Please note that the Gramm-Leach-Bliley Act and the CCPA allow us to keep certain forms of data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. In addition, there may be certain data that we may not allow you to review for legal, security, or other reasons.

NOTICE TO VERMONT RESIDENTS

We will not share information we collect about you with non-affiliated companies except as permitted by law, including, for example, with your consent or to service your Account. We will not share information about your creditworthiness with affiliated and non-affiliated companies except with your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates.

NOTICE TO NEVADA RESIDENTS

We may contact our existing customers by telephone to offer additional financial products that we believe may be of interest to you. You have the right to opt out of these calls. To opt out of these calls, or for more information about your opt out rights, please reach us by calling **+1 786-358-9338** or by emailing Pepper Pay at support@pepperpay.com. You are being provided with this notice under Nevada state law. In addition to contacting Pepper Pay, Nevada residents can contact the Nevada Attorney General for more information about your opt out rights by calling **+1 702-486-3132**, emailing aginfo@ag.nv.gov, or by writing to: **Office of the Attorney General, Nevada Department of Justice, Bureau of Consumer Protection 100 North Carson Street, Carson City, NV 89701-4717.**

Pepper Pay will not discriminate against customers exercising their rights as mentioned above. Specifically, we will not deny you services, charge you different prices for services or provide you with a different level or quality of services.

Please note: When you visit our App or Site, download and use our services, apply for a product or service, or open or maintain an account with us, you signify acceptance of the terms of this Privacy Policy and consent to the collection, use, and disclosure of your Personal Information as described above. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.