

General:

This Privacy Policy (“Policy”) describes the ways FinFit Ops, LLC (“FinFit”, we, us) collects, stores, uses and protects information we receive from you or that you may provide when you visit www.finfite.com (the “Site”). FinFit may amend this Policy from time to time by posting a revised version on our website. By visiting www.finfite.com, you are accepting the practices described in this Policy. If you do not agree with the terms of this Policy, you may not access, visit or use this Site.

Information Collected:

We collect the following categories of Personal Information that identify, relate to, describe or are reasonable capable of being associate with or linked with a consumer or a device:

Category	Examples
Personal Identifiers	Name, physical and mailing address, email address, phone numbers, date of birth, and social security number.
Other Personal and Financial Information	Signature, bank name, bank routing and account number, and credit/debit/prepaid card numbers.
Characteristics of Protected Classifications	Age, gender, marital status, and veteran or military status.
Commercial Information	Records of financial loans or other financial products or services obtained or considered, or other purchasing or consuming histories or tendencies
Internet and Network Activity	Browsing history, search history, information about your computer or mobile device (browser type, operating system, connection speed), your interaction with the Service or advertisements on the Service, a date and time stamp of your visit to the site, pages visited, time of visit and content viewed.
Professional or Employment Information	Employer name, type of job, wages, title, pay rate and pay frequency.
Education Information	Level of education attained
Inferences Drawn from Personal Information	We use the information you provide to create a profile reflecting your creditworthiness to underwrite your loan.

The Service is not intended for users under the age of 18 and we do not knowingly collect Personal Information from users under the age of 18.

Sources of Information Collected:

We collect Personal Information from you when you apply for a FinFit Loan* and/or create a membership account. We collect Internet and Network Activity if you are a user of the Service even if you do not apply for a FinFit Loan or create a membership account. If you apply for a FinFit Loan, we may also obtain Personal information about you 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 Ops, 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. Personal 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 you with a FinFit loan or other financial products, services or educational materials you request from FinFit.
- Market new FinFit loans or other financial products or services available through FinFit.
- Provide services and support for your loan or other financial products or services and/or your use of the Service;
- Process transactions and send notifications regarding your loan or other financial products or services from FinFit and general operation of the Service;
- Resolve disputes, collect fees and troubleshoot problems involving your loan or other financial products or services from FinFit and your use of the Service;
- 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 Personal Information as described in this Policy. We may share the following categories of Personal Information with affiliates and business partners as well as third-party service providers under contract who support our business operations including credit bureaus, member services, transfer or payment, fraud prevention, secure data storage and other similar services: Personal Identifiers, Other Personal and Financial Information, Characteristics of Protected Classifications, Commercial Information, Profession or Employment Information, Education Information and Inferences Drawn from Personal Information.

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 Personal 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 Personal 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 Personal 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. **FinFit does not sell your Personal Information.**

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 www.finit.com/contact.

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 www.finit.com/contact 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 www.finit.com/contact. 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: www.finit.com/contact

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.

January 2019