



**General:**

This Privacy Policy (“Policy”) describes the ways WageNow, LLC (“WageNow LLC”, we, us) collects, stores, uses and protects information we receive from you or that you may provide when you visit the WageNow product on [www.finfit.com](http://www.finfit.com) (the “Site”). WageNow may amend this Policy from time to time by posting a revised version on our website. By visiting [www.finfit.com](http://www.finfit.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 WageNow advance. We collect Internet and Network Activity if you are a user of the Service even if you do not apply for a WageNow advance. If



you apply for a WageNow advance, 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 WageNow, LLC, FinFit Ops, LLC and our partners and affiliates 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. We store and process 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. We use 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 financial products, services or educational materials you request.
- Market new financial products or services available through to you.
- 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 financial products or services and general operation of the Service;
- Resolve disputes, collect fees and troubleshoot problems involving your financial products or services FinFit and your use of the Service;
- Prevent potentially prohibited or illegal activities;
- Enforce any agreements you may enter into with us;
- 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 us to share data back to a service provider who you previously authorized to share data with us. We obtain assurances that these parties are properly licensed and regulated and only use Personal Information in connection with the services they perform for us or as you may have otherwise authorized. We may, from time to time, exchange information with third parties to determine the feasibility of a partnership.

In addition, we 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 our 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

We 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 any agreement with us, or other purposes as authorized by law.



We will only share a member's information with third parties as described in this Policy. We will not share a member's financial information with other customers without permission. **We do 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.finfit.com/contact](http://www.finfit.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 us. 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 these. 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.finfit.com/contact](http://www.finfit.com/contact) or phone at 1-888-928-7248. 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.finfit.com/contact](http://www.finfit.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 we modify 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: 1-888-928-7248 or contact us via our Contact page: [www.finfit.com/contact](http://www.finfit.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.

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