

ONLINE PRIVACY POLICY

Effective Date: January 1, 2020

Last Reviewed: June 4, 2021

Your privacy is important to Libertas Funding, LLC (“Libertas”, “we”, “us” and “our”). This Online Privacy Policy (“Policy”) explains how we collect, share, use, and protect information when you visit or use this online service and any other product or service offered by or through Libertas. This policy covers Libertas’ online services, any product or service offered by or through us, as well as any interactions you may have while viewing content provided through one of Libertas’ digital advertising campaigns.

As you review this Online Privacy Policy, here are a few general principles to keep in mind:

- Our online services are directed and intended for businesses located in the United States.
- Our online services are not intended for children under 18. We do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18, we will delete that information.
- If you have a financial product or service with us, we will use and share any information that we collect from or about you in accordance with this Policy.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website or products or services offered by us or through us. By accessing or using this Website or products or services offered by us or through us, you agree to this Privacy Policy. This Policy may change from time to time (See Changes to Our Privacy Policy below). Your continued use of this Website or products or services offered by us or through us after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

Information We Collect

Personal Information

When you visit or use our online services or obtain a product or service from us or through us, we may collect personal information from or about you such as your name, business name, email address, mailing address, telephone number(s), account numbers, user name and password. We may also collect social security number, driver’s license number, financial information (such as bank statements, credit card statement, average bank balance, personal and business credit history, payment behavior, bank account information, tax identification number and beneficial ownership information) when you provide such information and where we believe it is reasonably required for ordinary business purposes.

Usage and Other Information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device

you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

Additional Sources of Information

We may also collect information about you from additional online and offline sources including from co-branded partner sites or commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.

Use of Information

We use the information that we collect about you or that you provide to us (including any personal information) in a number of ways, such as:

- To present our website and its content to you
- To process your applications and transactions;
- To verify your identity and conduct appropriate due diligence;
- To register you as a user and identify you when you sign into your account;
- To prevent fraud and enhance the security of your account or our online services;
- To respond to your requests and communicate with you;
- To perform analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view;
- To provide you with tailored content and marketing messages;
- To operate, evaluate and improve our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing, and other internal functions);
- To comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies;
- For any other purposes that we may specifically disclose at the time you provide, or we collect your information; and
- For any other purpose with your consent.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Privacy and Sharing of Information

Libertas may share your personal information with third parties only in the ways that are described in this Policy and as permitted or required by law. We do not sell your personal information to third parties.

We may share anonymous or aggregated information with third-parties to help deliver products, services, and content that are tailored to the users of our online services and for other purposes without restrictions.

We may disclose personal information that that we collect about you or that you provide to us in a number of ways, as described in this Policy. For example, we may share your personal information with:

- Libertas' subsidiaries and affiliates;
- Libertas' bank partner; and
- Libertas' contractors, service providers and other third-parties that we use to support our business (and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which it was disclosed to them)

We may also disclose your personal information:

- To comply with any court order, law, or legal process including a bankruptcy proceeding or to respond to any government or regulatory request;
- To third-parties or affiliates in connection with a corporate transaction, such as a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Libertas' assets (whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding);
- To enforce or apply our terms of use, applicable policies, other agreements, including for collection purposes;
- When we believe in good faith that disclosure is necessary to investigate fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties;
- For any other purpose disclosed by us when you provide the information; and
- To any other third-party with your prior consent to do so.

Understanding Cookies, Web Beacons and Other Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

Cookies or browser cookies are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags, single pixel-gifs or web beacons (which are typically one-pixel, transparent images located on a webpage or in an email or other message) or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

Local Shared Objects, sometimes referred to as "flash cookies" may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation but may not be managed in your browser in the same way.

(We do not collect personal information automatically but we may tie this information to personal information about you that we collect from other sources or you provide to us.)

Do Not Track

Many web browsers possess a do-not-track feature that lets your browser tell websites you visit that you do not want to have your online activities tracked.

Linking to Third-Party Websites

Libertas may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may be different from ours. We expressly disclaim any responsibility and/or liability for all content made available to you on third-party websites. We encourage you to carefully read the privacy policy and terms and conditions of any website you visit. You should familiarize yourself with the privacy notice/policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Data Security

Libertas takes the security of your information very seriously. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Your information is securely sent to Libertas with 256 bit-encryption over the Transport Layer Security (TLS) protocol. This creates an encrypted connection between your browser and our servers. When you enter personal information (such as your Social Security Number or bank account number), we encrypt the transmission of that information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. We recommend that you do not use unsecure channels to communicate personal information (such as your Social Security number or account number) to us.

Accessing/Updating/ Correcting Your Information

Keeping your account information up-to-date is very important. You may be able to review or update certain account information by logging in and accessing our Online Portal. If you cannot change the incorrect information online, or if you prefer to request changes offline, please call us at 1-800-704-8675 or email us at Customer.service@libertasfunding.com.

Changes to this Online Privacy Policy

Libertas reserves the right to amend this Policy at our discretion and at any time. When we make material changes to this Policy, we will post the updated Policy on the Website and update the

Policy effective date. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise. **Your continued use of our Website or products or services offered by us or through us following the posting of changes constitutes your acceptance of such changes.** We encourage you to periodically review this page for the latest information on our privacy practices.

To Opt-out of Marketing Communications

If you would like to opt-out of marketing communications, please notify us by email at Customer.service@libertasfunding.com or send a letter to Libertas Funding, LLC, 382 Greenwich Avenue, Suite 2, Second Floor, Greenwich, Connecticut 06830, Attn: Privacy.

Please include your full name and business mailing email addresses and account number. Once we locate your contact information based on the information you provide us, it will be removed from our databases and mailings lists.

Questions/Contact Information/Designated Request Address

If you have any questions or comments about this Policy, the ways in which Libertas collects and uses your information described above, or your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: (800) 704-8675
Website: <https://libertasfunding.com>
Email: Customer.service@libertasfunding.com
Postal Address: Libertas Funding, LLC
Attn: Customer Service Department
382 Greenwich Avenue
Suite 2, Second Floor
Greenwich, CT 06830