

PRIVACY POLICY

Effective and last updated January 27, 2025

INTRODUCTION

Velocity Solutions, LLC and its affiliates (“Velocity,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use, share, and safeguard your information. This Privacy Policy applies to individuals who access this website (“Site”) and any of our online services (collectively, “Services”).

Your bank, credit union, or other organization (collectively, “Financial Institution”) has engaged Velocity, a technology provider, to manage on your Financial Institution’s behalf, this Site. The personal data you submit through the Site, including financial transactions you may initiate on the Site, are processed by and submitted to us via your Financial Institution. For more information on how your Financial Institution processes your personal data, please view its privacy policy. We are not responsible for the privacy or data security practices of your Financial Institution.

If you have a consumer financial product or service with your Financial Institution, your Financial Institution will use and share any information that it collects from or about you in accordance with its U.S. Consumer Privacy Notice, which offers you certain choices with respect to the use and sharing of your personal information.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:

- 1. PERSONAL DATA WE COLLECT**
- 2. HOW WE USE YOUR PERSONAL DATA**
- 3. HOW WE SHARE YOUR PERSONAL DATA**
- 4. SECURITY**
- 5. THIRD PARTY LINKS**
- 6. CHILDREN’S PRIVACY**
- 7. NOTICE TO CALIFORNIA RESIDENTS**
- 8. ACCESSIBILITY**
- 9. HOW TO CONTACT US**

1. PERSONAL DATA WE COLLECT

We collect personal data from you through your use of the Site and Services. Personal data is information that is linked or reasonably linkable to an identified or identifiable individual. We collect the following types of personal data:

Personal Data You Provide

Depending on how you interact with our Site and Services, we will collect the following personal data that you voluntarily provide to us for the following purposes. Please note that we process this personal data primarily as a data processor on behalf of your Financial Institution:

- *User Verification.* When you verify your status as an account holder at your Financial Institution, you will provide us with your name, date of birth, and the last four digits of your social security number.
- *Create an Account.* When you create an account, you will provide us with your last name, date of birth, last four digits of your social security number, and email address.
- *Complete a Form.* When you fill out a form or fields, you may provide us with your name, address, and email address.
- *Apply for a Small Business Loan.* If you are using the Site to apply for a small business loan from your Financial Institution, you may provide us with your name, phone number, date of birth, Social Security number, tax ID/EIN, driver's license number, signature, credit and income information, information about your assets, business ownership information, and business assets.
- *Contact Us.* If you contact us, you will provide us with your name and any information you choose to provide in your message. You may also provide us with your email address, phone number, or address.

You may use your account to access, correct, or view certain personal data we have collected and which is associated with your account.

Personal Data as You Navigate Our Site

We automatically collect certain personal data through your use of our Site and our use of cookies and other tracking technologies, such as the following:

- *Usage Information.* For example, the pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Site visitors on a city-regional basis.

Personal Data We Collect About You from Other Sources

In some cases, we may receive personal data about you from other sources. This includes from the Financial Institutions and government entities, credit reporting agencies, identity verification providers, operating systems and platforms, mailing list providers, and marketing partners.

2. HOW WE USE YOUR PERSONAL DATA

In addition to the purposes stated above, we may use all the personal data we collect in accordance with applicable law such as to:

- Maintain and improve our Site and Services;
- Protect the security and integrity of our Site and Services;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our terms, and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Policy and any applicable agreements and policies;
- Defend our legal rights and the rights of others;
- Fulfill any other purposes for which you provide it;
- For any purpose that is reasonably necessary to or compatible with the original purpose for which we collected the personal data as disclosed to you; and
- Comply with applicable law.

3. HOW WE SHARE YOUR PERSONAL DATA

We may share the personal data that we collect about you in the following ways:

- With Financial Institution(s) to complete a transaction or originate a loan requested by you;
- With vendors who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.);
- With vendors who provide services related to rewards offers and reward certificate distribution;
- With vendors who perform income verification services, identity verification/anti-money laundering services, and data aggregation services to process a small business loan;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;

- To establish, exercise, or defend our or a third party’s legal rights, including providing information to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data;
- With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events;
- With any other person or entity where you consent to the disclosure; and
- For any other purpose disclosed by us when you provide the personal data or for any other purpose we deem necessary, including to protect the health or safety of others.

4. SECURITY

We maintain commercially reasonable security measures to protect the personal data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal data, we cannot guarantee absolute security.

5. THIRD PARTY LINKS

The Site may contain links that will let you leave the Site and access another website. Linked websites are not under our control. We accept no responsibility or liability for these other websites.

6. CHILDREN’S PRIVACY

The Site and Services are not intended for children under 18 years of age. We do not knowingly collect, use, or disclose personal data from children under 18.

7. NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”), requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information or lawfully obtained, truthful

information that is a matter of public concern. For purposes of this “**NOTICE TO CALIFORNIA RESIDENTS**” section we will refer to this information as “Personal Information.”

The CCPA’s privacy rights described below do not apply to Personal Information that your Financial Institution collects, processes, sells, or discloses subject to the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. Because your Financial Institution is subject to those laws and regulations, much of the Personal Information that it collects is exempt from the CCPA. Your choices and rights with respect to your Financial Institution’s use and sharing of that information are subject to its U.S. Consumer Privacy Notice.

The CCPA’s privacy rights also do not apply to certain types of Personal Information subject to the federal Fair Credit Reporting Act (“FCRA”). Some of your Financial Institution’s services are subject to the FCRA and, therefore, exempt from the CCPA on that basis.

Notice at Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated Date of this Privacy Policy, have collected the following categories of Personal Information. We primarily collect this Personal Information on behalf of your Financial Institution:

- Identifiers (name, postal address, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number)
- Unique personal identifiers (device identifier; cookies, or other similar technology; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device)
- Personal information described in California’s Customer Records statute (California Civil Code § 1798.80(e)) (signature, telephone number, as well as the categories listed in “Identifiers” category above)
- Characteristics of protected classifications under California or federal law (age (40 and older))
- Commercial information (records of personal property, products or services purchased, obtained or considered; other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (information regarding consumer’s interaction with website or application)
- Date of birth
- Geolocation data
- Inferences drawn from above information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

We collect Personal Information directly from California residents, Financial Institutions, government entities, credit reporting agencies, identity verification providers, operating systems and platforms, mailing list providers, and marketing partners. We do not collect all categories of Personal Information from each source.

In addition to the purposes stated above in the section “**HOW WE USE YOUR PERSONAL DATA**” we currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Advancing our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

Sale, Sharing, and Disclosure of Personal Information

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information:

Category of Personal Information	Categories of Recipients
Identifiers (name)	Credit bureaus Electronic signature providers Fraud/AML Providers Loan Service Providers Hosting providers Rewards fulfillment providers
Personal information described in California’s Customer Records statute (California Civil Code § 1798.80(e)) (signature)	Credit bureaus Electronic signature providers Fraud/AML Providers Loan Service Providers

	Hosting providers
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We disclosed Personal Information for the following business or commercial purposes:

- Helping to ensure security and integrity
- Performing services

We do not knowingly collect or sell or share the Personal Information of consumers under 16 years of age. We do not use sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations.

We have not sold or shared Personal Information in the twelve (12) months preceding the Last Updated Date of this Privacy Policy.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;
- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

How to Submit a Request to Know, Delete, and/or Correct

You may submit a request to know, delete, and/or correct by either:

- Calling us at 1.833.700.6909; or
- Contacting us through our [privacy request portal](#).

When we act as a business under the CCPA, we will process your request directly. When we act as a service provider on behalf of your Financial Institution, you will need to make your request directly with your Financial Institution.

As mentioned above, if you are a California resident who has a financial product or service with your Financial Institution, much of the Personal Information that it collects is exempt from the CCPA and, therefore, is not subject to the rights discussed in this “**NOTICE TO CALIFORNIA RESIDENTS**” section. Your choices and rights with respect to your Financial Institution’s use and sharing of that information are subject to its U.S. Consumer Privacy Notice.

Our Process for Verifying a Request to Know, Delete, and/or Correct

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected California Personal Information, or an authorized agent, which includes:
 - A valid copy of a California Driver’s License
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with your California Personal Information if we cannot verify your identity or authority to make the request and confirm the California Personal Information relates to you. Absent a power of attorney, authorized agents shall provide a signed permission from the consumer before Velocity Solutions may fulfill the request.

Making a verifiable consumer request does not require you to create an account with us.

We will only use California Personal Information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

Shine the Light Law

We do not disclose personal information obtained through our Site or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

8. ACCESSIBILITY

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.

9. HOW TO CONTACT US

To contact us for questions or concerns about our privacy policies or practices, please contact privacy@csiweb.com.