

# Online Privacy Notice

**Last Modified: 9/14/21**

## INTRODUCTION

The FirstFin Credit program (“Company”, “Our”, “Us”, or “We”), respects your privacy and is committed to protecting it through our compliance with this online privacy notice (the “Notice”).

This Notice describes the types of information we may collect from you or that you may provide when you visit the website [www.firstfincredit.com] (our “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Notice applies to information we collect:

- On this Website.
- In e-mail, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Notice 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. By accessing or using this Website, you agree to the terms of this Notice.

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 our [Consumer Privacy Notice](#) which offers you certain choices with respect to the use and sharing of your personal information.

## CHILDREN UNDER THE AGE OF 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13 please contact us at [customerservice@firstfincredit.com](mailto:customerservice@firstfincredit.com).

## INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We may collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, Social Security Number, or any other information the Website collects that is defined as personal or personally identifiable information under an applicable law (“personal information”);
  - That is about you but individually does not identify you; and/or
  - About your Internet connection, the equipment you use to access our Website, and usage details.
- We may collect this information:
- Directly from you when you provide it to us.
  - Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons and other tracking technologies.
  - From third parties, for example, our business partners.

## **INFORMATION YOU PROVIDE TO US**

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us or when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we may ask you to complete for research purposes.
- Details of transactions you carry out through our Website.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, “Posted”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

## **INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and Internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include personal information; we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.

- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices about How We Use and Disclose Your Information.
- Web Beacons. Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email, and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

## **HOW WE USE YOUR INFORMATION**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- To market our goods or services to you.
- For any other purpose with your consent.

## **DISCLOSURE OF YOUR INFORMATION**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide as described in this Notice:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business; we expect those parties who handle your personal information to keep your information confidential and use it only for the purposes for which we disclose it to them.
- 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 the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use an "email a friend" feature of our Website, we will transmit the contents of that email and your email address to the recipients.

- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Where appropriate, we will limit sharing of your information in accordance with the choices you have provided us in response to our [Consumer Privacy Notice](#).

## **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

For our customers who would prefer we not deliver marketing offers in email, postal mail, or through telemarketing, you may manage your direct marketing choices by telephone at 1-888-419-0225, or you can email us at [customerservice@firstfincredit.com](mailto:customerservice@firstfincredit.com) (for all customers who do business with us).

For non-customers who wish to be placed on our Do-Not-Contact registries for marketing (phone, mail, text, email), non-customers may make that election by contacting us at 1-888-419-0225, or you can email us at [customerservice@firstfincredit.com](mailto:customerservice@firstfincredit.com).

We currently do not have software recognizing do-not-track (DNT) settings that you may have set in your browser. Such DNT signals or mechanisms may provide you with the ability to exercise choice regarding the collection of personally identifiable information about your online activities overtime and across third-party websites or online services. However, the Company does not track your activities over time across various websites except as otherwise stated directly above. In limited circumstances, third parties may track your activities over time across sites, including this Site, such as website analytic tools.

## **DATA SECURITY**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website such as message boards. The information you share in public areas may be viewed by any user of the Website.

If you receive an unsolicited email, or other electronic communication that appears to be from us but have reason to believe it is from another source, and may be fraudulent, then call us at 1-888-419-0225, or email us at [customerservice@firstfincredit.com](mailto:customerservice@firstfincredit.com).

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.

The Company is not responsible for third parties' (companies to which we link from our Website) online security

practices. In most cases, we provide links to non-Company websites solely to help you find more information about topics that interest you. Third-party websites may have different privacy policies and/or security standards to govern their sites; we encourage you to learn about their privacy and security policies and practices.

## **CHANGES TO OUR ONLINE PRIVACY NOTICE**

It is our policy to post any changes we make to our Notice on this page. If we make material changes to how we treat our users' personal information, we will notify you. To the extent you engage in an online business with our Company, then we will notify you by email via the email address specified in your account. Otherwise, we will notify you through a temporary notice on the Website home page. The date the Notice was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Notice to check for any changes.

## **CONTACT INFORMATION**

To ask questions or comment about this Notice and our privacy practices, contact us by telephone at 1-888-419-0225, or you can email us at [customerservice@firstfincredit.com](mailto:customerservice@firstfincredit.com).