

## **Privacy Policy**

Last updated: September 5, 2023

Welcome and thank you for your interest in Freedom Financial Network, LLC ("Site"). The Site is the property of Freedom Financial Network, LLC ("Freedom", "we", "us" or "our"). This (Freedom Financial Network, LLC) Privacy Policy applies to this Site and any other site and mobile apps owned and operated by Freedom Financial Network, LLC and its wholly owned affiliates (collectively "Freedom", "we", "our" or "us").

This Policy is provided to communicate how we and our affiliates collect, protect, use, share and retain your personal information when visiting our Site.

**Please read this Policy before using our Site as continued navigation constitutes your agreement to the term of this policy.**

### **Changes to this Privacy Policy**

Freedom reserves the right to update this privacy policy at any time. When we make changes, we will revise the date at the top of this page. Changes will be effective when posted unless otherwise indicated. We encourage you to check this page periodically to stay informed about how we help provide the information we collect.

### **Personal Information We Collect**

For the purposes of this Privacy Policy, "personal information" shall mean individually identifiable information from or about an individual.

We collect personal information from you when you visit, interact or register on our website and apps, respond to an advertisement on third party websites or call us. We may collect the following information:

- Information you provide: email address, full name, telephone number, date of birth, address, employment, salary, etc.
- Information from third parties: credit reporting data (accounts, pay history, balances), lead generation data.
- Participation in contests or surveys: We collect personal information such as name, address, email address and phone number when you participate in contests or fill out surveys sponsored by us or our affiliates. Survey information collected may include characteristics, preferences, behaviors, attitudes, ability, intelligence predispositions, etc. We collect this information in order to improve our services, products and to improve our members' experience with us.
- Information from cookies or other tracking technologies:
  - Cookies are small blocks of data created by a web server while a user is browsing a website. This data is stored on your hard drive containing non-personally

identifiable information about you. This data functions as your computer's identification and enables us to improve your experience by maintaining your authenticated session and preferences. We and our third party vendors use "cookies" and similar tools to track your use of the Website when you use our services. Our systems automatically log information about your computer, tablet or phone.

You may choose to set your web browser to notify you when you receive a cookie or refuse cookies altogether. If you do so, some parts of the Site may not function as intended.

We reserve the right to transfer and/or sell aggregate or group data about Users of the Site Offerings for lawful purposes. Aggregate or group data is data that describes the demographics, usage and other characteristics of Site Offerings Users as a group, without disclosing personally identifiable information.

- Internet, device or other activity  
We may collect certain non-personally identifiable information about you and your desktop computer, tablet or mobile device when you visit the Site. This non-personally identifiable information includes, without limitation, the type of browser that you use, your IP address, the type of operating system that you use and the domain name of your Internet service provider. We use the non-personally identifiable information that we collect to improve the design and content of the Site and to enable us to personalize your experience. We also may use this information in the aggregate to analyze usage of the Site.
- Referring exit pages/Advertising  
Freedom, as well as third party entities such as Google®, use cookies, pixels and other tracking technology (collectively, "tracking technology") in connection with the Site for purposes of tracking Users' activities (such as websites visited, advertisements selected and pages viewed) after they leave the Site. Freedomfinancialnetwork.com, and its third-party partners, use this tracking technology to target applicable Users with advertisements featuring products/services we offer, as well as third-party products/services that may be of interest to applicable Users. In addition, Freedomfinancialnetwork.com uses a third party service called Hotjar in order to better understand our Users' needs and to optimize our offerings. Hotjar is a technology service that helps us better understand our Users' Site-related experience (e.g. how much time they spend on which Site pages, which links they click on, what Users do and do not like, etc.) and this enables us to build and maintain our offerings. Hotjar uses cookies and other technology to collect data on our Users' behavior and their devices (in particular, the various devices' IP addresses (captured and stored only in

anonymized form), device screen size, device type, browser information, geographic location (country only) and preferred language used to display our website). Hotjar stores this information in a pseudonymized User profile. Neither Hotjar nor Freedomfinancialnetwork.com will ever use this information to identify individual Users or to match this information with additional data on an individual User.

In general, Users may be able to disable some, or all, of this tracking activity by utilizing the “Do Not Track” setting or similar options within most major Internet browsers.

Users can opt-out of certain Google®-related tracking technology, and customize the Google® Display Network ads that they receive, by visiting the Google® Ads Settings at: <https://adssettings.google.com/>

Google® also recommends installing the Google® Analytics Opt-out Browser Add-on for your web browser, which is available here: <https://tools.google.com/dlpage/gaoptout>

To the extent permissible under applicable law, we are not responsible for the tracking practices of third-parties in connection with the Site.

Google® is a registered trademark of Google, Inc. (“Google”). Please be advised that Freedom is not in any way affiliated with Google, nor are the Site Offerings endorsed, administered or sponsored by Google.

### **Use of Your Personal Information**

Information we gather from you or third parties is used to:

- Inform you about products or services we think you will be interested in
- Facilitate the use of our Site
- Improve our Site, product offerings or services
- Consider you for the products/services we offer
- Verify your eligibility, identity
- Contact you regarding your inquiry, account or employment opportunities
- Process payments on your behalf
- Create and maintain login information for our Site
- Monitor, conduct, improve analytics on our products, services and offerings
- Internal administrative, security, relationship management
- Send push notifications
- Detect and protect against security incidents, malicious, deceptive, fraudulent or illegal activity

## **Sharing your Personal Information**

Freedom shares your personal information with unaffiliated third parties as permitted or required by law. We may share your personal information with our affiliated or unaffiliated third parties as part of joint marketing campaigns.

We may also provide your information to third-party companies and individuals who perform certain functions on our behalf. When we share your information with service providers, we require the security and confidentiality of your information as well as limiting their use of the information to reasonably carry out their work with us, including to comply with applicable state and federal laws. Third parties we may share your information with include:

- Affiliates to market/consider you for their products/services
- Servicing partners to provide statements, process payments
- Financial Institutions who partner with us for products and services we offer
- Marketing service providers to send direct and electronic mail, remove duplicate information from User lists, analyze data and provide marketing analysis
- Other financial service third parties for their marketing purposes as permitted by law (for California or Vermont residents we will not sell or share your personal information for to nonaffiliated marketing third parties without your consent)
- Auditors, examiners, law enforcement
- Credit reporting agencies

These companies' privacy and information sharing practices are set forth in their respective privacy policies.

We may also transmit information between and among our affiliates, services providers, or contractors who may be located in facilities in other countries. We take precautions to protect your information and abide by the laws of the country to which we first received your information. Transfer of information to other countries may subject your personal information to the laws of that country, thus if permitted by law, may be accessible without notice to you by the courts, law enforcement and national security authorities of that country. By using our Site or agreeing to use our products and services you acknowledge the collection, international transfer, storage and processing of your information in other countries.

Further, personal information may be disclosed or transferred as part of any merger, consolidation, sale of assets, equity financing or other situations where personal information may need to be transferred.

## **Protecting your Personal Information**

Freedomfinancialnetwork.com takes the privacy and security of our visitors' and members' personal information seriously. We maintain industry standard technical and physical safeguards designed to safeguard your information. When you make personal information available to us, we protect it both while transmitting from your browser to our servers and while stored on our systems through encryption

standards with advanced TLS (Transport Layer Security). Facilities where our systems are located can only be accessed by authorized individuals.

Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the internet or wireless networks can be guaranteed to be 100% secure. As such, we cannot warrant that your personal information will be absolutely secure.

You can also take precautions to keep your information safe. Following are some methods that can help:

- Be cautious when using public networks or computers. Make sure to completely log out of accounts and clear caches after use.
- Choose complex passwords
  - Don't use things related to birthday, address, phone or any PIN

### **Third-Party Websites**

This Site may contain links to third-party owned and/or operated websites including, without limitation, websites owned and/or operated by Freedom's service providers and/or marketing partners. We are not responsible for the privacy practices or the content of those websites/companies. These third-party websites and entities have separate privacy and data collection practices and Freedom has no responsibility or liability relating to them.

### **Minors**

Freedom's site is not directed or intended for individuals under 18 and does not knowingly solicit or collect information from visitors under 18. Visitors under 18 should not provide any personal identifiable information of any kind on our Site. If we learn or are notified that we have collected any information on someone under 18, we will promptly remove the data from our system.

### **Visiting our Website from Outside the United States**

The freedomfinancialnetwork.com site is intended to provide products and services inside the U.S and is governed by the laws of the U.S. If you are visiting the Site from outside the U.S., your communication with us may result in the transfer of your to leave your country. By visiting the Site and/or otherwise communicating electronically with us, you consent to such transfers, even if your jurisdiction does not have the same privacy laws as the jurisdiction where our servers are located, we will treat your information as subject to the protections of U.S. Law, this Policy and our Consumer Privacy Notice.

### **Changing or Updating your Information**

Freedom relies on you to update and correct your personal information. If you find that our information about you is incorrect or incomplete and our Site does not permit you to update or correct certain information, contact us:

**Phone:** 800-655.6303

**Email:** [customerservice@freedomfinancialnetwork.com](mailto:customerservice@freedomfinancialnetwork.com)

**Opt-Out/Unsubscribe:**

You may opt out of some promotional or information sharing options the following ways:

**Promotional emails:**

To opt-out of receiving emails from us, you can:

- click on “unsubscribe” in the footer of any email message,
- e-mail us at: [customerservice@freedomfinancialnetwork.com](mailto:customerservice@freedomfinancialnetwork.com), or
- call us at 800-655.6303

**Information Sharing**

To opt out of information sharing, you can:

- email us at [customerservice@freedomfinancialnetwork.com](mailto:customerservice@freedomfinancialnetwork.com), or
- call us at 800-655.6303

We may or may not be able to honor your request if you have an account with us.

**SMS messages/Push Notifications**

When you opt-in to the SMS service, Freedom will send you a message to confirm your signup. Freedom SMS campaigns are sent to opted-in subscribers for the purposes of marketing, program updates and account notifications. Message frequency varies. Message and data rates may apply. Text "HELP" to 480-520-1797 for help.

You can cancel this service at any time. Just text "STOP" to 480-520-1797. After you send the message "STOP" we will send you a reply message to confirm that you have been unsubscribed. After this, you will no longer receive messages from us. If you want to join again, text START to 480-520-1797 and we will start sending messages to you again. Message frequency varies. Message and data rates may apply.

For all questions about the services provided, you can contact:

[customerservice@freedomfinancialnetwork.com](mailto:customerservice@freedomfinancialnetwork.com)

800-655-6303

**Notice to California Residents**

This section applies solely to California residents and supplements, and in no way limits, the Privacy Policy set forth above. This notice is being provided by Freedom Financial Network and its wholly owned affiliates (collectively “Freedom”, “we”, “our”, or “us”).

These Provisions are intended to be in compliance with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in these Provisions. This notice explains how/what personal information we collect, use and share of the personal information

collected and the rights and choices for California Residents with respect to our handling of their personal information.

This notice does not include personal information in relation to:

- Publicly available information from government records.
- De-identified or aggregated User information.
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-LeachBliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**Notice of Collection of Personal Information**

The personal information we collect depends on California residents’ interactions with us. Following are the types of interaction and the information we may collect:

Types of interaction:

- Website and Mobile App Use and Registration
- Applying for Products or Services
- Participation in Surveys and Contests
- Communicating with Us

Category of Personal Information	Collected	Sold	Disclosed for a Business Purpose
<b>Identifiers:</b> Full Name, Social Security Number, Email address alias, postal address, Internet Protocol address, email address, account name, telephone number, username, password or other similar identifiers, driver’s license, passport or other similar data.	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Financial data:</b> Bank account, credit or debit card number, transactions	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law

<b>Protected Classification Characteristics under state and federal law:</b> age, race, sex, religion, national origin and marital status.	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Commercial Information:</b> records of personal property, products or services obtained.	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Biometric Information:</b> preferences, trends, abilities, predispositions, characteristics, behaviors.	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Network activity information:</b> Browsing history, search history, interaction with a website, application or advertisement	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Geolocation data:</b> physical location of device	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law
<b>Professional or employment related information:</b> Current or past job history.	Yes	No	Marketing partners, banking partners, government entities, law enforcement, auditors, examiners, lawyers and other parties as required by law

**Use of Personal Information**

Information collected is used to personalize your experience on our Site, improve your experience with our Site, products and services, to advertise to you, recognize you on subsequent visits, verify your



identity, evaluate you for certain products/services, build a better member experience, improve member relationship protocols, fulfill contract obligations with you, to respond to inquired from you, testing, research, analysis, product development, respond to law enforcement, court orders or governmental examiners and to train and educate employees for compliance purposes.

We may also supplement the information you provide or that we gather from your interaction with our Site by using third party sources such as credit bureau information and address/phone information to verify your identity and to protect you against fraud or identity theft.

The consent you provide us to receive SMS messages does not permit unaffiliated third parties to send you SMS messages for marketing/promotional purposes.

### **California Residents Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. Following are those rights and how to exercise them.

#### **Right to Know Access**

You can request free of charge the following information covering the prior 12-months of your request:

- The categories of personal information we collected about you
- The categories of sources for the personal information we collected about you
- Our business purpose for collecting or selling that personal information
- The categories of third parties with whom we have shared that personal information
- The specific pieces of personal information we collected about you (also called a data portability request)
- The categories of information that we sold in the prior 12 months, and for each category, the categories of third parties to which we sold that particular category of personal information
- The categories of information that we disclosed for a business purpose in the prior 12 months and for each category, the categories of third parties to which we disclosed that particular category of personal information

#### **Right to Opt-Out of the Sale of Your Personal Information**

The CCPA provides its residents the right to opt-out of our sale of your personal information to third parties.

#### **Right to Request Deletion**

You have the right to request that we delete your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request to delete your personal information from our (their) records, unless a CCPA exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our obligations in connection with our contract with you.

Please be advised that deleting your personal information may terminate your access to certain of the Site Offerings. If you wish to continue using the full complement of Site Offerings, we may not be able to delete all of the personal information that we have on file for you.

Further after we delete your personal information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

### **How to Exercise your Rights**

If you wish to exercise any of your CCPA rights noted above or have any questions or comments about this privacy policy, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please contact us by either:

- Calling us at: 800-655-6303
- Emailing us at: [customerservice@freedomfinancialnetwork.com](mailto:customerservice@freedomfinancialnetwork.com)

We will respond to your request within the provisions allowed by CCPA; in no event later than 45 days of the receipt of your request, unless we notify you of any delay otherwise.

### **Submitting Requests for Someone Else**

California residents can utilize an “Authorized Agent” to make requests on their behalf. We will require that the Authorized Agent provide us with a valid written authorization confirming said authority that is executed by you and the Authorized Agent.

### **Identity Verification**

When you make any CCPA request, we are required to verify your identity before providing a response to the request. We will ask you to verify your identity when you submit a request, including any Authorized Agent’s identity.

### **Right to Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights, including but not limited to:

- Deny you goods or services

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services