## **Privacy Policy**

Last updated: July 25, 2024

Please click here to review our <u>Freedom Financial Network Gramm-Leach-Bliley Act</u> <u>Privacy Notice</u>

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

This Privacy Policy is provided to communicate how we and our affiliates collect, protect, use, share and retain your personal information when visiting our Site. Please note that this Privacy Policy applies only to our information-gathering, use, and dissemination practices in connection with our Site. This Privacy Policy does not apply to any of our information practices conducted separately by Freedom outside of our Site. To the extent that we provide you with notice through our Site or otherwise, of different or additional privacy policies or practices (e.g., at the point of collection), those additional privacy policies shall govern such data collection and use.

# 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:

- <u>Information you provide:</u> email address, full name, telephone number, date of birth, address, employment, salary, etc.
- <u>Information from third parties:</u> credit reporting data (accounts, pay history, balances), lead generation data.
- <u>Participation in contests or surveys</u>: We collection 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. For more detailed information about how to disable or administer your cookie settings in your web browser, please refer to the applicable page for the browser you are using:
    - Safari: <u>http://help.apple.com/safari/mac/8.0/#/sfri11471</u>
    - Google Chrome: <u>https://support.google.com/chrome/answer/95647?hl=en</u>
    - Microsoft Edge: <u>https://support.microsoft.com/en-us/microsoft-edge/delete-coo</u> <u>kies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae0</u> <u>9</u>

### Firefox: <u>https://support.mozilla.org/en-US/kb/clear-cookies-and-site-dat</u> <u>a-firefox</u>

- 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.
- o 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.
- o 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. Freedom, 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, Freedom 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 Freedom will ever use this information to identify individual Users or to match this information with additional data on an individual User. For more information about how Hotjar processes your information, please review their privacy policy here: https://www.hotjar.com/legal/policies/privacy/. 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 may share your personal information with its own affiliates and nonaffiliated third parties as provided below. However, SMS opt-in data and consent will not be shared between Freedom affiliates nor with any nonaffiliated third parties.

Freedom shares your personal information with its own affiliates to consider you, or market to you, their products and services.

Freedom may provide your information to nonaffiliated third-party service providers 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.

Freedom may share your personal information with the following nonaffiliated third parties:

- Financial services companies for marketing purposes as permitted by law. As noted above, however, SMS opt-in data and consent will not be shared.
- Auditors, examiners, law enforcement
- Credit reporting agencies

#### **Protecting your Personal Information**

Freedom 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
- Use different passwords for each website

#### **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.

#### **Social Security Protection Policy Statement**

It is our policy to protect the confidentiality of Social Security numbers (SSNs) from misuse and improper disclosure by maintaining and enforcing physical, electronic, and procedural safeguards. We prohibit unlawful disclosure of SSNs, and limit access to SSNs to our personnel who need access to SSNs in order to perform their job functions. We do not disclose SSNs to third parties except where required or permitted by law.

#### 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.

#### Your California Privacy Rights

If you are a California resident, you have certain privacy rights under the California Consumer Privacy Act ("CCPA"). Please refer to our <u>CCPA Privacy Policy</u> for information about your rights under the CCPA.

Residents of California may also, under §1798.83, known as the "Shine The Light" law, request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request clearly in writing to us using the contact information provided below.

#### 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: 800-979-4337

Online Form: https://www.requesteasy.com/63ef-2553

#### **Opt-Out/Unsubscribe:**

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

#### **Promotional emails:**

To opt-out of receiving e-mails from us, you can: a) click on "unsubscribe" in the footer of any e-mail message, or b) complete the online format: <u>https://www.requesteasy.com/63ef-2553</u>, or c) call us at 800-979-4337.

#### **Information Sharing:**

To opt out of information sharing, you can: a) complete the online form at: <u>https://www.requesteasy.com/63ef-2553</u> or b) call us at 800-979-4337. We may or may not be able to honor your request if you have an account with us.

#### Text message/Push Notifications:

To opt out of text/push notifications, by replying "STOP" to the notification. Or you can call/email us as noted above.