

# Privacy Notice

**Last Updated: October 2023**

## **Uprova Credit, LLC Privacy Notice**

### ***Facts***

What does Uprova Credit, LLC (“Uprova”) do with your personal Information?

### **Why?**

Financial companies choose how they share your personal information. Federal and Tribal law gives consumers the right to limit some, but not all, sharing. Federal and Tribal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### **What?**

The personal information we collect and share includes:

- Information that you provided to us in your loan application, including:
  - Name, address, email address, and other contact information
  - Social security number
  - Banking information
  - Information about your employment
- Rather than applying directly with us, you may have submitted your information to a third party website – a lead generator – which is designed to connect individuals seeking credit with online lenders who may be able to offer credit. The lead generator then presented your information to us to evaluate. The exact information provided may differ depending on which lead generator you submitted your information to, but it will include, at a minimum, the information identified in the previous bullet.
- Information we obtain about you from other parties such as:
  - Information obtained from one or more credit reporting agencies that we use in the course of underwriting your application.
- Information about your transactions, such as:
  - If you obtain a loan with us, we keep track of your payments and loan performance. This helps us offer you products and services we think you’ll like, and we also use it for internal reporting, improving our services, and other business purposes.
    - This includes any transactions you’ve engaged in with our affiliated entities.

## How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reason Uprova Credit, LLC chooses to share; and whether you can limit this sharing.

## ***Reasons we can share your personal information***

**For our everyday business purposes** - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, perform tests or analysis, or report to credit bureaus.

- Does Uprova Credit, LLC share?** Yes
- Can you limit this sharing?** No

**For our marketing purposes** - to offer our products and services to you.

- Does Uprova Credit, LLC share?** Yes
- Can you limit this sharing?** Yes

**For joint marketing with other financial companies**

- Does Uprova Credit, LLC share?** No
- Can you limit this sharing?** Uprova Credit, LLC does not share.

**For our affiliates' everyday business purposes** - information about your transactions and experiences.

- Does Uprova Credit, LLC share?** Yes
- Can you limit this sharing?** No

**For our affiliates' everyday business purposes** - information about your creditworthiness.

- Does Uprova Credit, LLC share?** No
- Can you limit this sharing?** Uprova Credit, LLC does not share.

**For our affiliates to market to you**

- Does Uprova Credit, LLC share?** Yes
- Can you limit this sharing?** Yes

**For non-affiliates to market to you**

- Does Uprova Credit, LLC share?** Yes
- Can you limit this sharing?** Yes

**To limit our sharing:** Call toll-free 1-866-362-3444. **Please note:** If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing, if the limitation is allowed.

## Questions?

Call 1-866-362-3444 or go to our website at [www.uprova.com](http://www.uprova.com).

## Who We Are

### Who is providing this notice?

Uprova Credit, LLC provides this privacy policy. It applies to all loans made by the company and all products and services offered in connection with such loans.

## What We Do

### How does Uprova Credit, LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal and Tribal law. These measures include computer safeguards such as 256-bit AES encryption of data in transit and at rest, compliance with standards such as PCI-DSS, as well as physical security measures in our call center.

### How does Uprova Credit, LLC collect my personal information?

We collect your personal information, for example, when you:

- Apply for a loan
- Give us your income information
- Provide employment information
- Direct us where to deposit funds
- Give us your contact information

We also collect your personal information from others, such as credit bureaus, affiliated entities, or other companies.

Additionally, while this may not constitute personal information, we use third-party analytic tools such as Mouseflow (<https://mouseflow.com>) on our website to track page content to track user click/touch, movement, scroll, and keystroke activity, and for UI/UX optimization purposes. If you wish to opt out of this specific type of data collection you may do so at <https://mouseflow.com/opt-out>

### Why can't I limit all sharing?

Federal and Tribal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes - information about your creditworthiness (Uprova does not share this information);

- Affiliates from using your information to market to you;
- Sharing for non-affiliates to market to you.

### **What happens when I limit sharing for an account I hold jointly with someone else?**

Uprova does not provide joint accounts.

### **Age Restriction**

We do not knowingly collect personal information from anyone under the age of 13. Uprova's services are limited to users 18 years of age or older. We recommend parents monitor their children's internet usage.

## ***Definitions***

### **Affiliates**

Companies related by common ownership or control. They can be financial and non-financial companies.

- Our affiliates include companies that, like Uprova Credit, LLC, are wholly owned by the Habematolel Pomo of Upper Lake.

### **Non-affiliates**

Companies not related by common ownership or control. They can be financial and non-financial companies. Non-affiliates to whom we transfer your information are only allowed to use that information for specified purposes.

- Non-affiliates with whom we share information can include direct mail providers, other companies that help us market our services, debt collectors, data providers, and credit reporting agencies.
- If you apply for a loan with Uprova and are rejected, we may give you the opportunity to share your application data with other, unaffiliated lending entities. We will ask you if you wish to do this and we will not share your data in this manner without your consent.

### **Joint Marketing**

A formal agreement that exists between non-affiliated financial companies that together market financial products or services to you.

- Joint marketing partners can include financial institutions, marketing firms, and other lending companies.
- Uprova does not engage in joint marketing.

## ***Tracking Information***

When you visit the Uprova Credit, LLC (“Uprova”) website, a cookie is placed on your computer if you accept cookies. The cookie we place on your computer may include personally identifiable information that you provided to Uprova. Uprova advertises its products and services on websites that you may visit and uses service providers to place such advertisements. Those service providers (such as Google, Microsoft, Yahoo, Facebook, Instagram, and other platforms) may use cookies placed on your computer to show you advertisements for Uprova services on other websites. You can opt-out from service providers' use of cookies in this manner by visiting each service provider's advertising opt-out page or by utilizing "do not track" functionality in your web browser. Note that if you choose to not have your browser accept cookies from the Uprova website, not all features may operate as intended – for example, if your browser shuts down in the middle of the application process, you may have to restart the process.