

Privacy Policy

Last Updated March 31, 2023

LoanPro Software, LLC (“LoanPro” or “we”) strongly supports and believes in security and privacy. The following policies and procedures outline how we protect customer data and the personal information of individuals.

Please note the tables at the end of this Privacy Policy that contain our additional policies and information specifically with respect to information and data collected and processed in connection with financial transactions, such as loans processed by the LoanPro Service.

Both federal and state law in the United States define Personal Information or Personal Data, as do the laws of Canada, the European Union, and other countries and jurisdictions. This Privacy Policy is intended to include the most expansive definition. However, please recognize that your rights related to your Personal Information, and how Personal Information is defined, are based upon your state, province and/or country where you reside.

PERSONAL INFORMATION THAT WE COLLECT

LoanPro collects information about our Free-Trial and paid LoanPro Service clients (“Clients”), our Clients’ personnel, and third parties to whom Clients have made loans. This information includes the following Personal Information:

- Contact information: full name, phone, address, company name, industry, email address.
- Financial information relating to loans that individuals may have with our Clients.
- Payment information, including credit card type or number, bank account number, billing address (under our PCI DSS Level 1 AOC).
- Data gathered by our software such as browser type, time, location, and IP address from which the software is accessed.
- Purchasing history: LoanPro stores the names of persons who sign contracts on behalf of Clients.
- Information regarding use of our SaaS software and support services by Client employees and authorized users,

including IP addresses, usernames, and encrypted passwords.

- Information listed in the Financial Transactions tables below.

California Consumer Privacy Act Notice: Pursuant to the § 1798.110 of the California Consumer Privacy Act (“CCPA”), the categories of Personal Information that we have collected about individual consumers in the preceding twelve months are:

- **Identifiers and Categories of Personal Information listed in the California Customer Records Act** - See the identifiers listed above that are collected by LoanPro.
- **Customer Records** - This information is stored in the form of documents attached to a Client file. The Client records collected and processed by LoanPro include identifiers as well as financial information, as outlined above.
- **Internet Activity** – LoanPro collects only IP addresses.
- **Employment Information**
- **Inferences about personal preferences and attributes drawn from profiling** (e.g., using cookies)

LoanPro does not offer services or sell products to children and does not request or knowingly collect Personal Information from minors.

HOW WE COLLECT YOUR PERSONAL INFORMATION

General. We collect Personal Information when:

- you or your employer or organization sign up for or register an account with us
- you visit our website.
- you complete an offer form on a marketing website for a free trial account of the LoanPro Service
- you use the LoanPro Service or our other services or software
- participate in a feature of our website that requests or requires your Personal Information
- you otherwise transact business with or communicate with LoanPro (in person or by telephone, email, mail or otherwise)
- your Personal Information is contained in the records of a loan that a Client is using the LoanPro Service to process.

Our Clients act as data controllers (“Controllers”) in the use of the software and the collection and processing of Personal Information to be able to effectively operate the software. In such cases, our role in processing the Personal Information provided by our Clients is as a “Processor,” since we are processing data on behalf of the Controller (who is the Client). As a Processor, we are obligated to process this Personal Information as part of our license agreement entered with the Client. Our license agreement, as well as this Privacy Policy, obligate us to treat all such information as confidential.

We also collect Personal Information in the following ways:

Methods listed in the Financial Transactions section (see below).

Cookies and other tracking technologies - The software we provide may set cookies in your web browser to store information during a period of software use. This information is necessary for various tools and features of the software including the collector queue, search parameters, and other features that use cookie data. You can change your web browser settings at any time to stop accepting cookies or to prompt you before accepting a cookie from the sites you visit. If you do not accept cookies, however, the LoanPro Service will not function properly for you, and you may not be able to use some sections or functions of our websites. We may also use other web-based user tracking technologies, such as clear GIFs, Flash cookies, pixel tags, or web beacons.

Data obtained for marketing purposes for potential Clients or others. We may obtain marketing data from third parties that we use to reach out to inform potential Clients and others of our services. The Personal Information collected generally includes the email address of a contact person with a potential Client or other and may also include their name and phone number. We also use the contact information provided to us by our Clients to communicate information about our products and services, which may include marketing our products and services.

HOW WE USE YOUR PERSONAL INFORMATION

We may use and process Personal Information for any purpose that is permitted under applicable data protection laws in accordance with this Privacy Policy. “Processing” of Personal Information includes collecting, recording, organizing, structuring, storing, altering or modifying, retrieving, transmitting, disclosing or otherwise making available to third parties, deleting, and otherwise using or dealing with your Personal Information.

We may process your Personal Information with or without automatic means.

These purposes include:

- **Our business purposes**, including addressing customer service issues and warranty claims; processing sales leads, quotes, invoices and payments; collecting debts; planning and conducting marketing activities, trade shows, trials, consultations, seminars, webinars, and demonstrations; responding to inquiries; conducting web analytics, security monitoring, and business operations and administration; and addressing tax and other regulatory requirements. Our business purposes also include the purposes listed in the Financial Transactions section below.
- **Purposes related to our software products, including SaaS or cloud-based software.** These purposes include licensing and operation of the software, remote management, education and information services, training, webinars, communication, customer service, system monitoring and data security. We use Personal Information to enable use of software features and related services, including through use of third-party service providers. We also use Personal Information to communicate with our users to inform them of software updates and enhancements, educational information, available software features and modules, and other information that may be helpful or informative for our users.
- **Marketing.** Your Personal Information will not be used for cold calling. However, we send Clients and users of our SaaS software marketing communications, on an opt-in basis, to inform them of and offer new products, services, promotions, or other business opportunities to our Clients . If you would like to stop receiving information about Special Offers from LoanPro, please see the “YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION” section of this Privacy Policy below.
- **For the protection of LoanPro and others.** If LoanPro, in good faith, determines that you have used the service to menace, threaten, harass, intimidate or otherwise deceptively pose as another person, or in any other way in violation of law. Simply, if you attempt to use the website or purchase or use a product for any unlawful means, you have no expectation of privacy and we may use and disclose any and all information for the protection of LoanPro and others.
- **Pursuant to law, rule or regulation.** If required or permitted to do so by law or if, in good faith, LoanPro believes that such action is necessary to: (1) comply with laws and regulations or with legal processes; (2) protect and defend LoanPro’s rights and property or prevent fraud; (3) protect LoanPro against abuse, misuse or unauthorized use of LoanPro’s products or services; (4) protect the personal safety or property of our personnel, users of our website or the public; and/or (5) comply with tax reporting requirements, then LoanPro may use and disclose any and all information as needed. The servers that serve our website automatically identify a computer by its IP address.
- **Aggregated and de-identified data.** We may anonymize data to create statistical data or system usage data, by removing all personal identifiers and/or

aggregating your data with other's data so that it is not identifiable as to any particular person. Such de-identified data may be retained and used by LoanPro to improve and enhance its products and services and for other proper purposes, provided that such retention and use is permitted by applicable laws.

Legal basis. We base our processing of Personal Information on the need to perform our contractual obligations under our license agreements and our legitimate activities as a provider of software and related services. We also process Personal Information to comply with applicable law and to exercise our legal rights. We may also use your Personal Information for internal purposes, including auditing, data analysis, system troubleshooting, and research. In these cases, we base our processing on legitimate interests in performing the activities of the organization.

HOW WE SHARE OR DISCLOSE YOUR PERSONAL INFORMATION

No sale of Personal Information. We never sell or rent Personal Information to third parties.

Disclosures of Personal Information. We may disclose or share your Personal Information with other parties in the following circumstances:

Third-party service providers. We may use other third-party service providers (or subprocessors) to process Personal Information to facilitate use of our products and services, to provide services that are integrated with our LoanPro Service or other offerings, and in the operation of our business. This includes providing Personal Information to third parties for their processing in performing functions on our behalf, particularly the functions listed above in the "HOW WE USE YOUR PERSONAL INFORMATION" section. These functions include processing payments, collecting debts, hosting software, performing security services, analyzing data, performing surveys, administering our website(s), and/or providing technical support services. These third party providers will be contractually and/or legally required to protect Personal Information from additional processing (including for marketing purposes) and transfer in accordance with applicable laws.

Affiliates. Some of our services, including portions of the LoanPro Service and customer support services, are provided by LoanPro's affiliates, and we share Personal Information with our affiliates for those business purposes. We may also share data with affiliates to market integrated products and services, however, any such additional products and services offered are provided on an opt-in basis only.

LoanPro shares Personal Information with its affiliates only in accordance with strict data security procedures.

Compliance with law and protecting our legal rights. We may disclose your Personal Information to regulatory bodies if we have a good-faith belief that doing so is required under applicable laws or regulations. This may include submitting Personal Information required by tax or other governmental authorities, or lawfully requested by governmental agencies, including law enforcement and judicial authorities. We may also disclose your Personal Information in order to exercise or defend our legal rights; to take precautions against liability; to protect the rights, property, or safety of LoanPro or any individual or third party; to maintain and protect the security and integrity of our information system; to protect LoanPro against fraudulent, abusive, or unlawful acts; or to investigate and defend LoanPro against third-party claims or allegations.

Corporate Transactions. If a third party acquires all or substantially all of the assets of, or ownership interests in, LoanPro whether by merger, acquisition, reorganization or otherwise, LoanPro may transfer its database, including all Personal Information contained therein, to the acquiring entity.

Aggregated and de-identified data. We reserve the right to disclose aggregated user statistics as well as non-personally identifiable information (such as anonymous usage data), in order to describe our services to prospective partners, licensees, advertisers, and other third parties.

DATA SECURITY AND STORAGE

LoanPro uses at least industry-standard security methods and precautions to protect our Clients' information and all Personal Information. When Clients submit sensitive information, it is protected using safe and secure methods reasonably available. LoanPro, through its use of Secure Payments (which holds a PCI DSS Level 1 AOC Certificate) is fully PCI DSS compliant. In addition to PCI DSS compliance and data encryption, we also use industry-standard security procedures to protect data offline. Our employees use Client-provided support codes to gain access to data in order to provide support. Through this system, a record is automatically kept of who authorized such support & who provided the support.

Specific security measures implemented by LoanPro include:

- PCI DSS-compliant

- SOC 1, SOC 2 Type II compliant
- Veracode Secure Development Certification for all developers.
- Non-disclosure agreements (NDAs) are signed with employees, vendors and contractors
- Obligatory security awareness training for all employees on an annual basis.
- Drug test and criminal checks for all employees
- System monitoring using Sumo Logic, AWS Console and
- Technical security policies include:
 - Data backup policy
 - Data Retention, Storage & Disposal Policy
 - Data Encryption & Key Management Policy
 - Acceptable Encryption Policy
 - Vulnerability & Risk Rating Process
 - Asset Inventory
 - AWS Physical Security Policies for servers
 - Change Control Process
 - Change Control for Infrastructure Process
 - Log review process
 - Firewall & Router Configuration standards
 - System Hardening and Configuration Standards
 - OWASP Guidelines adherence

We use Amazon Web Services (AWS) and Google Drive to store electronic information. All data access by LoanPro is restricted to within our pre-approved office locations and data center. Only employees who need the information to perform a specific job are granted access to Personal Information. Our employees must use a secure shell (ssh) to

access this information and must also be allowed access from a specific IP address within our offices. Furthermore, all employees are kept up-to-date on our security and privacy practices to avoid security breaches through what is called "social engineering." Important details and changes are discussed in staff meetings and email memos. Finally, the servers on which we store Personal Information are kept in a secure environment, protected by a firewall and kept in a secure room in our data centers for physical security, currently with Amazon AWS.

RETENTION OF PERSONAL INFORMATION

LoanPro processes Personal Information for a reasonable period of time to fulfill its business purposes stated above. Personal Information is then archived for time periods as required or necessitated by law or legal considerations. LoanPro reserves the right to delete a Client's data, including Personal Information provided by that Client, from its system after its license agreement with that Client terminates. LoanPro also deletes Personal Information in response to an individual's request, as set forth in the "YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION" section below.

LoanPro reserves the right to retain usage data relating to our products and services, as well as data that has been anonymized and/or aggregated, to the extent permitted by applicable laws. With respect to any Personal Information collected by us for marketing or for our own internal purposes, we will retain that data for a reasonable time in order to fulfill those purposes.

We regularly review our retention policy to ensure compliance with our obligations under data protection laws and other regulatory requirements.

YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION

General. If you wish to opt out from any of the uses of Personal Information that are specified in this Privacy Policy, except in the case of legal proceedings or where your data is required for tax, transactional or other legal purposes, please contact us as described in the "LOANPRO'S CONTACT INFORMATION" section below. Please note that your subsequent disclosure of Personal Information to us may override prior opt-out requests. LoanPro does not discriminate against those who opt out. However, opting out may prevent us from conveniently and efficiently providing further, product support services and information to you.

Unsubscribing to marketing communications: In particular, if we are sending you email communications of a marketing nature, an 'unsubscribe' option is provided in the footer of every email. You may also contact us directly to unsubscribe to marketing emails or other marketing communications, at the contact information set forth in the "LOANPRO'S CONTACT INFORMATION" section below. If you have agreed to receive marketing communications, you may always opt out at a later date.

While LoanPro does not sell Personal Information or other client data, we have enabled tracking of whether a Client has opted out of the sale of its data. This can be updated at any time upon the Client's request.

Your California privacy rights. This section applies to California residents only.

- **Shine the Light law.** Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of Personal Information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. LoanPro does not presently share any information with third parties for direct marketing purposes. However, to submit such a request, you can contact us as set forth below.

California Consumer Privacy Act (CCPA). Pursuant to the CCPA (Section 1798.100 et seq. of the California Civil Code), residents of California have the following rights:

- Right of access to your Personal Information, up to twice a year at no charge, including:
 - § The categories of Personal Information LoanPro collects about the consumer,
 - § The categories of sources of the consumer's Personal Information,
 - § The business or commercial purpose for collecting or selling the consumer's Personal Information,
 - § The categories of any third parties with whom the business shares the consumer's Personal Information, and
 - § The specific pieces of Personal Information collected about the consumer.

- Right to request deletion of data, subject to certain exceptions, such as where the information is needed to provide services to the consumer, or for security or legal reasons.
- Right to not be discriminated against for exercising your rights under the CCPA, such as denial of services or higher pricing.
- Right to opt out of having your Personal Information sold.

You can exercise your rights under the CCPA by calling our toll-free number set forth in the contact information below.

California Minors. California residents under age 18 (“California Minors”) have additional privacy rights under California law. LoanPro does not knowingly collect any Personal Information of California Minors or allow them to post content to our website or subscription service. To have any content or Personal Information provided by or about a California Minor removed, please contact LoanPro at the contact information provided below.

Your Canadian privacy rights. This section applies to Canada residents only.

Under the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA), we are required to comply with certain principles with respect to your Personal Information. These principles are:

- 1. Accountability:** We are accountable for the Personal Information we collect from you. We have developed a data protection policy for your business and appointed the data privacy officer to help you with any concerns related to your Personal Information.
- 2. Identifying purposes for collection of Personal Information:** This Privacy Policy identifies our purposes for collecting your Personal Information.
- 3. Obtain valid, informed consent:** We require your consent to the ways in which we collect, use and disclose your Personal Information, except in some limited, specific situations and as permitted by law (for example, to comply with laws and regulations, to protect our legitimate business interests, and to cooperate with law enforcement and governmental agencies’ requests). If we add a new use, we will request and obtain your consent for that new use before using your Personal Information in that new way. You may withdraw your consent by notifying us as specified below.

- 4. Limiting collection to identified purposes:** We limit the amount and type of the Personal Information we gather to what is necessary for the purposes identified in this Privacy Policy.
- 5. Limiting use, disclosure, and retention:** We limit our use, disclosure and retention of Personal Information to the purposes and uses identified in this Privacy Policy. We will destroy or erase your Personal Information when it is no longer necessary for those authorized purposes.
- 6. Accuracy:** We seek to keep your Personal Information correct and up-to-date. However, we will assume that the information we are supplied is accurate unless we are notified otherwise. You may contact us at any time to correct your Personal Information in our systems.
- 7. Safeguards:** We use reasonable and appropriate safeguards to keep Personal Information secure and private and guard against unauthorized access, loss, and theft.
- 8. Openness:** We make our privacy policies and practices easily available. If you have any questions, you may contact us at any time as set forth in the Contact Information section below.
- 9. Access:** If you request access to your Personal Information that is in our system, by contacting us as set forth below, we will provide you with a copy of that information within 30 days. Upon your request, we will also inform you if we have any of your Personal Information, explain how we've used your Personal Information, and provide a list of any other organizations to which your Personal Information has been disclosed.
- 10. Recourse for complaints:** You have the right to challenge our compliance with these guidelines. We commit to investigate all complaints and to modify our privacy practices if necessary.

If you wish to exercise any of your rights relating to your Personal Information or data under the principles outlined above, you may contact our Data Privacy Officer at the contact information set forth below. We may be unable to remove Personal Information to the extent that it is permitted or required to be retained by applicable law or document retention and data backup policies, or if removal is not practicable due to technological reasons. Please note that removal of your Personal Information may prevent or hinder us from providing further services and information to you.

LoanPro may require you to provide sufficient information to permit us to provide an account of the existence, use, and disclosure of Personal Information. The information provided shall only be used for this purpose.

Your Personal Information may be transferred outside of Canada for processing and storage. LoanPro and its service providers may store Personal Information on servers located in other jurisdictions, including the

United States. Please note that privacy laws in such jurisdictions differ from Canadian privacy laws (e.g., PIPEDA) and that in some jurisdictions your Personal Information may be accessed by law enforcement authorities or the courts in such jurisdictions.

PRIVACY POLICIES OF OTHER WEBSITES

Our websites contain links to other third party websites. This Privacy Policy applies only to our websites, so if you click on a link to another website, it is governed by their own privacy policy.

NOTIFICATION OF CHANGES

If we change this Privacy Policy, we will post those changes on this page. Please review our Privacy Policy often to keep yourself aware of what Personal Information we collect, how we use it, and under what circumstances, if any, we disclose it. If you object to any changes to this Privacy Policy, you may close your account and discontinue use of our website and services. Each time you use any service of LoanPro, you agree that the current version of this Privacy Policy applies.

LOANPRO'S CONTACT INFORMATION

If you have any questions about this Privacy Policy or the Personal Information that we hold, would like to cease receiving marketing materials from us, have any complaints, or would like to exercise any of your other rights related to your Personal Information, please contact us:

LoanPro Software, LLC
172 N East Promontory, Suite 300
Farmington, Utah 84025

Email: legal@loanpro.io
Phone: (800) 559-4PRO

Data Privacy Officer
Email: dataprivacy@loanpro.io

If you wish to report a complaint or if you feel that LoanPro has not addressed your concerns in a satisfactory manner, you may also contact your state or local data protection authority.

ADDITIONAL PRIVACY INFORMATION AND POLICIES RELATED TO FINANCIAL TRANSACTIONS:

FACTS	WHAT DOES LOANPRO DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires lenders to tell you how they collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Business EIN, address, contact information, and other business information, agent user's name and contact information
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 reasons LoanPro Software, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does LoanPro Software, LLC share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	YES	NO
For our marketing purposes —to offer our products and services to you.	YES	NO

For joint marketing with other financial companies.	YES	YES
For our affiliates' everyday business purposes – information about your transactions and experiences.	YES	NO
For our affiliates' everyday business purposes – information about your creditworthiness.	NO	We don't share

To limit our sharing	<ul style="list-style-type: none"> ● Call 1-800-559-4PRO ● Visit us online: https://loanpro.io/ ● Contact us via email: legal@loanpro.io <p>Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice unless you have expressly directed us to immediately share your information. 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.</p>
Questions?	Call 1-800-559-4PRO or go to https://loanpro.io/

Who we are	
Who is providing this notice?	LoanPro Software, LLC

What we do	
How does LoanPro protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does LoanPro collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ● Open an Active or Trial Account ● Use your payment profile on file ● Use our websites ● Give us your contact information <p>We also may collect your personal information from others, such as affiliated partners, our Clients and other companies, social media, government agencies, and public records to provide our services and to comply with government requirements to know our customers.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ● Sharing for affiliates' everyday business purposes ● Affiliates from using your information to market to you ● Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional right to limit sharing.</p>

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-Affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <p><i>Non-Affiliates we share with can include service providers and integrated partners for feature offerings.</i></p>
Joint Marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <p><i>Our joint marketing partners include financial institutions, service level providers, industry consultants and other lending companies.</i></p>