

**CONNEXMARKETS, INC.**  
**PRIVACY NOTICE**

Last Updated: March 18, 2024

This Site is owned and operated by ConnexMarkets, Inc. (“**CXM**”, the “**Company**”, “**we**”, “**us**” or “**our**”). We at CXM respect and protect the privacy of visitors to our Sites, and the privacy of our customers. This Privacy Notice describes our information handling practices when we collect, access, share, retain, dispose of, and otherwise process individuals’ personal information. This Privacy Notice applies to all personal information that we collect through the CXM websites (the “**Sites**”) and through any other means, including through third parties. Your use of the Sites and our Services is subject to this Privacy Notice and the **Terms of Service**.

The Sites are intended for use by residents of the United States only. CXM is not established, nor does it offer any products or services, outside of the United States. Any references to applicable law within this Privacy Notice are to Federal, State, and local laws and regulations within the United States.

Please review this Privacy Notice carefully. If you have any questions about it, please submit an email to [privacy@connexmarkets.com](mailto:privacy@connexmarkets.com).

This Privacy Notice describes and sets forth our policies on the following topics:

1. Your Acceptance of This Privacy Notice
2. Types of Personal Information and Technical Data We Collect and Use
3. How and Where We Collect Your Personal Information
4. Purposes For Which We Collect and Process Your Personal Information
5. Personal Information We Disclose to Third Parties
6. Personal Information We Obtain from Third Parties
7. Anonymous or Aggregated Data
8. Cookies and Trackers
9. Your Individual Rights and Choices
10. Data Retention
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## 1. Your Acceptance of This Privacy Notice

By providing your personal information to us or by using our Sites or our lending platform services (the “**Services**”), either as a potential borrower or as a potential lender, you signify your acceptance of this Privacy Notice. We may provide additional “just-in-time” disclosures, notice at the point of collection, or information about the data processing practices of specific Services. These notices may supplement our privacy practices as described herein.

If you do not agree with or you are not comfortable with any aspect of this Privacy Notice, you should immediately discontinue access or use of our Sites and Services, and you should not provide any of your personal information to us.

## 2. Types of Personal Information and Technical Data We Collect and Use

To establish an account and access our Services, we will ask you to provide us with some important information about you and your business. The chart below describes the categories and items of personal information we may collect from our customers and from others who interact with us through the Sites and whether we have collected such information within the last twelve months.

Category	Examples	Collected within last 12 months?	If Collected, Business or Commercial Purpose for Collection
A. Identifiers.	A real name, alias, postal address, unique personal identifier, signature, physical characteristics or description, online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes	(A) it is necessary for our legitimate interests; (B) we need to comply with legal or regulatory obligations; and (C) performance of any contract we are about to enter into or have entered into with you.
B. Contact Information (including business contact information)	Mailing address(es), telephone number(s), email address(es), job title, and other related individual and employer contact information.	Yes	(A) it is necessary for our legitimate interests; (B) we need to comply with legal or regulatory obligations; and (C) performance of any contract we are about to enter into or have entered into with you.

Category	Examples	Collected within last 12 months?	If Collected, Business or Commercial Purpose for Collection
C. Non-Public Personal Information	Education history, employer information, employment history, bank account number, credit card number, debit card number, or any other financial information,	Yes	(A) it is necessary for our legitimate interests; (B) we need to comply with legal or regulatory obligations; and (C) performance of any contract we are about to enter into or have entered into with you.
D. Sensitive personal information.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). <i>See below with respect to biometric information.</i>	Yes	(A) it is necessary for our legitimate interests; (B) we need to comply with legal or regulatory obligations; and (C) performance of any contract we are about to enter into or have entered into with you.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with our Sites, application, or advertisement and other technical data including, without limitation, internet protocol (IP) address, login data, browser type and version, time zone settings and general location, browser plug-in types and versions, operating system and platform, and device information related to the device(s) you use to access our Sites.	Yes	(A) it is necessary for our legitimate interests; and (B) we need to comply with legal or regulatory obligations.

Category	Examples	Collected within last 12 months?	If Collected, Business or Commercial Purpose for Collection
F. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No	
G. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No	
H. Geolocation data.	Physical location or movements.	No	
I. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No	
J. Professional or employment-related information.	Current or past job history or performance evaluations.	No	
K. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	

Category	Examples	Collected within last 12 months?	If Collected, Business or Commercial Purpose for Collection
L. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	No	

In addition to the above, we will collect and process your preferences in receiving marketing from us and from third parties, your communication preferences, and any other information you provide to us when utilizing the Services or our Sites. If you do not provide your personal data to us when requested, we may not be able to provide our Services to you. We may also not be able to perform any contract we have (or are trying to enter into) with you.

As we add new features and Services, you may be asked to provide additional information, and we will update this Privacy Notice accordingly. We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you further notice.

### 3. How and Where We Collect Your Personal Information

We may obtain personal information about you from the following sources:

- Directly from you: For example, from forms you complete or by using our Services.
- Indirectly from you: For example, from observing your actions on our Sites. When you visit any of our Sites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyze trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. For example, we may log your IP address for system administration purposes. IP addresses are logged to track a user's session. This gives us an idea of which parts of our Site users are visiting.

In addition, we may automatically receive and record the following information on our server logs:

- How you use the Services;
- Device type and unique device identification numbers;
- Device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL);
- How your device interacts with our Sites and Services, including pages accessed and links clicked;

- General (non-precise) geographic location; and
  - Other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser.
  - We may also use identifiers to recognize you when you access our Sites via an external link, such as a link appearing on a third-party site.
- Third Parties: For example, from third-party services which you connect to as part of using our Services.

From time to time, we may obtain information about you from third party sources as required or permitted by applicable law. These sources may include:

- Public Databases and ID Verification Partners: We obtain information about you from public databases and ID verification partners for purposes of verifying your identity in accordance with applicable law.
- Credit Bureaus: With your consent, we obtain information from credit bureaus, including your credit report. However, we will not disclose your credit report to third parties without your explicit permission. We obtain your credit information to better provide services to you, to match you with appropriate lenders, to ensure your identity, and to avoid fraud.
- Financial Institution: We may obtain information directly from your financial institution, including copies of your account statements. We obtain this information to assist in providing Services to you, including the underwriting process.
- Joint Marketing Partners and Resellers: Unless prohibited by applicable law, joint marketing partners or resellers may share information about you with us so that we can better understand which of our Services may be of interest to you.
- Advertising Networks and Analytics Providers: We work with these providers to provide us with de-identified information about how you found our Sites and how you interact with the Sites and Services. This information may be collected prior to account creation.

#### **4. Purposes For Which We Collect and Process Your Personal Information**

The purposes for which we process your personal information include the following:

a) To provide the Services

We process your personal information to provide the Services to you. For example, when you wish to seek a loan from one of our lending partners, we require certain personal information as described in Section 2 above. We cannot provide you with Services without such information.

b) To maintain legal and regulatory compliance

Our Services are subject to laws and regulations that require us to collect, use and store your personal information in certain ways. For example, we must identify and verify customers using our Services to comply with commercial lending laws across jurisdictions. In addition, we use third parties to verify your identity by comparing the personal information you provide against third-party databases and public records. When you seek to link a bank account to your CXM account, we may require you to provide additional information that we may use in collaboration

with service providers acting on our behalf to verify your identity or address, or to manage risk as required under applicable law. If you do not provide personal information required by law, we reserve the right to close your account and terminate our Services to you.

- c) To enforce this Privacy Notice, our Terms of Service and our other agreements with you

CXM handles sensitive information, such as your identification and financial data, so it is very important for us and our customers that we actively monitor, investigate, prevent and mitigate any potentially prohibited or illegal activities, enforce our agreements with third parties or prevent and detect violations of our Terms of Service and our other agreements with you and other parties.

- d) To detect and prevent fraud

We process your personal information to help detect, prevent and mitigate fraud and abuse of our services and to protect you against account compromise or information loss.

- e) To provide Service communications

We send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of important developments relating to your account that may affect how you can use our Services. You may not opt-out of receiving critical service communications, such as emails sent for legal or security purposes.

- f) To provide customer service

We process your personal information when you contact us to resolve any questions or disputes or to troubleshoot problems.

- g) To ensure quality control

We process your personal information for quality control and staff training.

- h) To ensure network and information security

We process your personal information to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations.

- i) For research and development purposes

We process your personal information to better understand the way you use and interact with our Services. In addition, we use such information to customize, measure, and improve our Services and the content and layout of our Sites and applications, and to develop new services.

- j) To engage in marketing activities

Based on your communication preferences, we may send you marketing communications (e.g., emails or mobile notifications) to inform you about our events or our partner events; to deliver targeted marketing; and to provide you with promotional offers.

In addition to the foregoing, we may use your personal information for any other legally-permitted purpose or for any purpose you consented to when you provided it.

## **5. Personal Information We Disclose to Third Parties**

We may share your personal or business information with one or more third parties for a business or other legal purpose. When we share information for business purposes, we do so pursuant to written contracts that describe the purpose of the information processing, require the recipient to keep the personal or business information confidential, prohibit the recipient from selling personal information, and prohibit the recipient from using the disclosed information for any purpose except as described in the contract. We may share your personal information for the following purposes:

a) Disclosure that is required by law

We may disclose information you provide if required to do so by law, at the request of a third party, or if we believe that disclosure is reasonable to (1) comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law) and (2) protect or defend CXM's or a third party's, rights or property.

b) Lenders or brokers

By signing up for our Services or submitting a request for a business loan product or service as offered on the Sites, you signify your agreement to proceed and that you agree to the disclosure of your Personal Information, including without limitation Sensitive Personal Information, with lenders and brokers within our network. We will not perform a credit check without your authorization. Please be aware that the lenders, brokers or other service providers with whom you are matched and with whom your information is shared may retain your information, even if you do not enter into an agreement for their products or services. Please contact each such party directly to obtain their privacy and information policies. Also, if you enter into an agreement with a lender, broker or other service provider through our Services and make changes to the information you have provided to us, we may share the updated information with such lenders, brokers and service providers.

c) Disclosure to third parties

Upon completing a profile on the Sites, and filling out an application, you may receive various marketing materials from our trusted third parties, including potential lenders and service providers. A list of those partners can be received upon request. We are not responsible for the material of the third parties or their actions. Your information will be treated as private and confidential by such third parties. If you do not wish to receive offers from our trusted partners, you can change your e-mail preferences at any time by following the steps outlined in the "Choice/Opt-Out" section below.

d) Sharing Certain Data on an Anonymized Basis

We may share anonymized or de-identified data, which has been stripped of personal identifiers with other potential borrowers and other potential lenders to understand the state of the loan market.



e) Categories of Service Providers With Whom We Share Personal Information

We engage various service providers under contract to help us with parts of our business operations. Examples of the types of service providers with whom we may share personal information include:

- Network infrastructure service providers;
- Cloud storage providers;
- Payment processing services;
- Transaction monitoring service providers;
- Information technology providers;
- Security service companies;
- Document repository service providers;
- Customer support service providers;
- Internet (e.g., ISPs);
- Data analytics specialists;
- Marketing service providers; and
- With our professional advisors who provide banking, legal, compliance, insurance, accounting, or other consulting services in order to complete third party financial, technical, compliance and legal audits of our operations or otherwise comply with our legal obligations.

During the preceding twelve months, we have shared the following categories of personal information to third parties for a business purpose:

- Category A: Identifiers
- Category B: Contact Information (including business contact information)
- Category C: Non-Public Personal Information
- Category D: Sensitive Personal Information
- Category E: Internet or other similar network activity

## **6. Personal Information We Obtain from Third Parties**

We may obtain data about our customers from third parties and combine it with information we already have about you, to create more tailored advertising and products.

If you provide information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

Any information obtained from a third party will be used to assist matching your business with various lenders.

The Sites contain links to other Sites that are maintained by third parties. These third parties are solely responsible for their own Sites and we encourage you to reach out to such third parties

for copies of and information regarding their security practices. We do not control, and are not responsible for, the privacy and security practices of these third parties.

If you authorize one or more third party applications to access your personal information stored by CXM, then information you have provided to CXM may be shared with those third parties. Unless you provide further authorization, these third parties are not allowed to use this information for any purpose other than to facilitate your transactions using CXM Services. Please note that third parties you interact with may have their own privacy policies, and CXM is not responsible for their operations. Information collected by third parties, which may include such things as contact details, or other personal information, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

Examples of account connections include:

- **Lenders:** If you use your CXM account to conduct a transaction with a third-party merchant, the merchant may provide data about you and your transaction to us.
- **Your Financial Services Providers:** For example, if you send us funds from your bank account, your bank will provide us with identifying information in addition to information about your account in order to complete the transaction.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Please review the privacy notice of any third-party that will gain access to your personal information.

## 7. **Anonymous or Aggregated Data**

We may use anonymized or aggregate customer data for any business purpose, including to better understand customer needs and behaviors, improve our products and services, conduct business intelligence and marketing, and detect security threats. We may perform our own analytics on anonymized data or enable analytics provided by third parties. We may de-identify or anonymize and use any category of data, including without limitation transaction data, click-stream data, performance metrics and fraud indicators.

## 8. **Cookies and Trackers**

Our Sites may collect information through "cookies." Cookies are small text files that are automatically placed on your computer or other device when you visit a website. The cookies are stored by the internet browser. The browser sends the cookies back to the website on each subsequent visit, allowing the website to recognize your computer or device. This recognition enables the website provider to observe your activity on the website, deliver a personalized, responsive service and improve the website.

Cookies make the use of our Sites easier by, among other things, saving your preferences. We may also use cookies to deliver content tailored to your interests. Our cookies may enable us to relate your use of our Sites to personal information that you previously submitted.

The information we collect with cookies allows us to statistically analyze usage of our Sites, and to improve and customize our content and other offerings. However, we only disclose information collected with cookies to third-parties on an aggregated basis without the use of any information that personally identifies you.

**Categories of Cookies We May Use.** To support our Sites and our services, we may use one or more of the following cookies throughout our Sites for the purposes set forth below:

- **Essential Cookies:** These cookies are essential to provide you with services available through our Sites and to enable you to use some of its features. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
- **Functionality or Customization Cookies:** These cookies allow us to remember choices you make when you use our services. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Sites.
- **Analytics and Performance Cookies:** These cookies are used to collect information about traffic to our Sites and how users use our Sites and services. The information gathered does not identify any individual visitor. The information is aggregated and therefore anonymous. It includes the number of visitors to our Sites, the websites that referred them to our Sites, the pages that they visited on our Sites, what time of day they visited our Sites, whether they have visited our Sites before, and other similar information. We use this information to help operate our Sites more efficiently, to gather broad demographic information, and to monitor the level of activity on our Sites. We use Google Analytics for this purpose to improve how our Sites operate. Google Analytics uses its own cookies.
  - You can find out more information about Google Analytics cookies here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>.
  - You can find out more about how Google protects your data here: <http://www.google.com/analytics/learn/privacy.html>.
  - To opt out of our Google Analytics Cookies, click here: <https://tools.google.com/dlpage/gaoptout/>.

**Web Beacons.** We may also use other similar technologies on our Sites to recognize and track visitors to our Sites. A web beacon (also known as a “tracking pixel” or “clear GIF”) is a clear graphic image (typically a one-pixel tag) that is delivered through a web browser or HTML e-mail, typically in conjunction with a cookie. Certain email communications you receive from us may contain web beacons. Web beacons allow us, for example, to obtain information such as the IP address of the computer device that downloaded the page on which the web beacon appears, the URL of the page on which the web beacon appears, the time the page containing the web beacon was viewed, the browser type used to view the page and the information in cookies. We use web beacons for activities such as monitoring the effectiveness of our communications, to understand whether users have come to our Sites from an online advertisement displayed on a third-party website, to measure how ads have been viewed and to improve Site performance.

**Third-Party Cookies.** Please note that third-parties (including, for example, advertising networks and providers of external services like web traffic analysis services) use third-party cookies in connection with your use of their websites and services, over which we have no control. These third-party cookies are likely to be analytical or performance cookies or targeting cookies. These companies may use information about your visits to our Sites and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements.

**Additional Information About Cookies.** You can find more information about cookies and how they work, what cookies have been set on your computer or mobile device and how to manage and delete them at <http://www.allaboutcookies.org>.

**Managing Cookies.** You can adjust your computer browser settings so that you are informed when a cookie is being placed on your browser. You can also set your browser to decline or accept all cookies. When you first access our Sites you may receive a message advising you that cookies and similar technologies are in use. By clicking “accept cookies,” you understand and agree to the use of the cookies and use of similar technologies described in this Policy. If you disable cookies, some features of our Sites may become disabled, and some aspects of our Sites may not function properly. Deleting cookies does not necessarily delete Flash objects. You can learn more about Flash objects – including how to control and disable them – through the Adobe interface. If you choose to delete Flash objects from our Sites, then you may not be able to access and use all or part of our Sites or benefit from the information and services offered.

**Do Not Track.** Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating that you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Sites do not currently respond to DNT signals. You can use the range of other tools we provide to control data collection and use, as described above. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## 9. Your Individual Rights and Choices

We retain your personal information as necessary to provide Services to you, and we store your personal and business information securely throughout the life of your CXM account. You may update or access your profile information at any time by logging into your account and making changes or updates.

If you want to stop using our Services, you may deactivate or delete your account. When you deactivate an account, your information will not be sent to any further lenders, brokers, or other third parties, but the information will not be deleted. By deactivating your account you will have the ability to restore the account in its entirety.

You also have the following rights with respect to your personal information by submitting a “verifiable consumer request” (as defined below):

### A. Requests to Know.

You may request disclosure of:

- The categories of personal information that we have collected about you.
- The categories of sources from which the personal information about you is collected.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information that we have collected about you.

- Categories of personal information that we “sold” or disclosed for a business purpose about you.
- Categories of third parties to whom the personal information was sold or disclosed for a business purpose.

You may submit a request to know up to twice within a 12-month period.

B. Requests to Delete.

You may request that we delete your personal information that we have collected and retained, subject to certain exceptions. Once we receive and confirm a verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Nevertheless, we may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete a 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 contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activities;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Enable internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Make other internal and lawful uses of that information that are compatible with the context in which it has been provided to us; or
- Comply with any applicable law or legal obligation.

C. Request to Correct or Amend.

You have the right to request that we correct any inaccurate personal information that we collected and retained about you, subject to certain exceptions. You may be able to correct certain information yourself by logging in and updating your online profile as described above. With respect to personal information unavailable for editing within your online profile, once we receive and confirm your verifiable consumer request, we will update (and direct our service providers to update) your personal information within our records, unless an exception applies. We may deny your correction request if we cannot verify your identity, or if we determine, under the totality of the circumstances that the contested personal information in our possession is more likely than not to be accurate.

D. Right to Opt-Out.

We do not sell your personal information. However, in the event we update this Privacy Notice to notify you we may “sell” your personal information (as defined under applicable law), you have the right, at any time, to direct us not to sell your personal information. This right may be referred to as the right to opt out. If you so direct us, we will refrain from selling personal information that we collect about you, unless you subsequently provide us express authorization for the sale of your personal information.

The following acts do not constitute the sale of personal information, meaning that you will not have the right to opt out of our sharing or disclosing your personal information in the following ways:

- If you direct us to intentionally disclose personal information, or you use us to intentionally interact with a third party (provided that the third party does not also sell the personal information, unless that disclosure would be consistent with applicable law).
- We use or share an identifier about you after you opt out of the sale of your personal information, for the purposes of alerting third parties that you have opted out of the sale of your personal information.
- We use or share with a service provider personal information that is necessary to perform a business purpose, if both of the following conditions are met:
  - we have provided notice of the information being used or shared; and
  - the service provider does not further collect, sell, or use the personal information except as necessary to perform the business purpose.
- We transfer to a third party the personal information of a consumer as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the business, provided that information is used or shared consistently with relevant provisions of applicable law.

E. Submitting a Verifiable Consumer Request

To exercise any of the rights described in this Section, we must receive a “verifiable consumer request,” which means the request must be sent by either: (i) the individual to

whom the personal information applies, or such individual's parent or guardian in the event the individual is a minor; or (ii) a natural person or a person registered with the Secretary of State, authorized by the individual to act on the individual's behalf, and we can reasonably verify the identity of the requestor. In addition, a verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Specifically, you must provide your full legal name and date of birth with your request.
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

If you choose to use an authorized agent to submit a request to know or a request to delete to us, we will require that you (i) provide us with a copy of the written permission you gave the authorized agent to submit the request to us; and (ii) verify your own identity directly with us. We may deny a request from an agent that does not submit proof that such agent has been authorized by you to act on your behalf.

If we reasonably determine that additional information is needed to properly verify your identity, we may request it before fulfilling your request. If you submit a request in a manner that is not one of the designated methods of submission described above, or if your request is deficient in some manner unrelated to the verification process, we will either: (i) treat the request as if it had been submitted in accordance with our designated manner, or (ii) provide you with specific directions on how to submit the request or remedy any deficiencies with the request, if applicable.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

**All requests to exercise your individual rights as described in this Privacy Notice should be directed to the contacts described in Section 19 of this Privacy Notice.**

#### F. Response Timing and Format

Upon receiving a verifiable consumer request, we will confirm receipt of it within 10 days and provide information about whether and how we will process the request.

We will deliver our written response either by mail or electronically. We will endeavor to respond to a verifiable consumer request within forty-five days of its receipt. If we require more time (up to 90 additional days), we will inform you of the reason and extension period in writing.

Any information we deliver in response to your request may be delivered by mail or electronically. If it is provided electronically, we will take reasonable steps to provide that the information will be portable and, to the extent technically feasible, in a readily useable format that would allow you to transmit the information to another entity without hindrance.

Any disclosures we provide will cover the 12-month period preceding the date we received the verifiable consumer request.

We do not charge a fee to process or respond to your verifiable consumer request unless the verifiable consumer request is excessive, repetitive, or manifestly unfounded. If we determine that the verifiable consumer request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **10. Data Retention**

We may retain your personal data after our Services are completed, if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between us and you or any third party, resolve any disputes between users, prevent fraud and abuse, or enforce this Privacy Notice, the Terms of Service or our agreements with you, and for as long as is necessary to provide support-related reporting and trend analysis. We also retain personal data if requested by law enforcement or as required under applicable law, regulation, or legal process. For example, certain federal and state regulations require that we maintain a record of your information for certain periods of time. Because of these regulations, we may be unable to completely delete your information from our database until the time requirements of these regulations have expired.

Any removed information may persist in our backup files but will not be generally available to users. We will not endeavor to delete any information that is stored in our backup files.

## **11. Non-Discrimination**

We will not discriminate against you for exercising any of your rights described in this Privacy Notice. Unless permitted by applicable law, we will not:

- 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 will receive a different price or rate for goods or services or a different level or quality of goods or services.

If permitted by applicable law, we may charge consumers a different price or rate, and to provide a different level or quality of goods or services to you, if that difference is reasonably related to the value that your data provides to us. We may also offer financial incentives, including payments to consumers as compensation, for the collection or other activities related to personal information. We will not use financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature.

If we offer any financial incentives, we will notify you of those financial incentives. We will enter you into a financial incentive program only if you give us prior opt-in consent, which may be revoked at any time.



## 12. Security

We use reasonable efforts to ensure the security of our systems. The Company employs reasonable physical, electronic and administrative safeguards to protect the information we receive from you from unauthorized disclosure. Internet data transmission is not always secure and we cannot warrant that information you transmit utilizing the Sites is secure.

Do not share your account login or password with any other individual. Your account login and password is sensitive and your sharing of your account information may lead to additional exposure to your account.

## 13. Children

The Sites and Services are not intended for children under 18 years of age. The Company does not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18 years of age, you may not use our Sites or Services. Please do not send any information about yourself to us. **By using our Services and our Sites, you represent that you are at least 18 years of age.**

## 14. Choice/Opt-Out

You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instruction included in these emails or you can contact us at [privacy@connexmarkets.com](mailto:privacy@connexmarkets.com).

You can choose not to provide us with certain information, but this will likely result in the inability to use certain features of the Sites and to obtain the Services and products you are seeking. As a general matter, do not post personal information on public forums the Sites may provide. You are solely responsible for the posting of any personal information on public forums.

If, after signing up for our Services, you decide you no longer wish to receive our services or future contact from lenders, brokers or other third parties to which your information has been referred, you may cancel your account as discussed herein. Upon cancelling your account, your information will no longer be sent to lenders, brokers, or other third parties. This does not guarantee that these lenders, brokers, or other third parties will cease contacting you or using your information. Please be sure to reach out to all lenders, brokers or other third parties to ensure they cease contacting you.

## 15. Special Notice to Vermont Residents

Vermont law places additional limits on sharing information about Vermont residents so long as they are residents of Vermont. In accordance with Vermont law, we will not share information we collect about Vermont residents to companies outside of CXM and its affiliates except: (1) as permitted by law; (2) to companies that perform marketing or other services on our behalf; (3) name, contact and transaction and experience information to other financial institutions with which we have joint marketing agreements; or (4) with the authorization or consent of the Vermont resident. We also will not share non-transactional information about Vermont residents received from others within the CXM family of companies except with the authorization or consent of the Vermont resident.

## **16. International Data Transfers of Personal Information**

We are based in the United States and our computer servers are located in the United States. Accordingly, all personal data in our possession and control is collected and processed by us in the United States. Any party that provides personal data to us is thereby transferring such data to the United States and is consenting to the transfer of their personal data to the United States. Individuals who access the Sites from outside the United States do so on their own initiative and at their own risk, and are responsible for compliance with local laws, rules and regulations.

## **17. Transfers of Personal Information In Connection with Corporate Transactions**

We may, in the future, sell or otherwise transfer some or all of the Company's assets to a third party. Your personal data and technical information may be disclosed to any potential or actual third-party purchasers of such assets or may be among those assets transferred. We may also share or transfer personal data and technical information in connection with a merger, divestiture, reorganization or other disposition (whether of assets, stock or otherwise), or in the event of our bankruptcy or other insolvency proceeding.

## **18. Modifications to This Privacy Notice**

We may update this Privacy Notice at any time and at our sole discretion. Any such modifications or updates will be effective upon posting on the Sites. You are responsible for checking the Sites for any updates to this Privacy Notice. If we modify this Privacy Notice, your continued use of the Sites will signify your acceptance of the modified Privacy Notice.

## **19. Contact Information**

You can contact us about this Privacy Notice by writing, by telephone or email us at the address below:

ConnexMarkets, Inc.  
64 Wall Street  
Madison, CT 06443

**Toll-Free Telephone Number:** 833.296.5363

**Email:** [privacy@connexmarkets.com](mailto:privacy@connexmarkets.com)