

FACTS**WHAT DOES SMB-FA CONSUMER 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 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 Types of personal information we collect and share depend on the product or service you have with us. This information can include

- Social Security number and income
- Credit history and credit scores
- Account balances and transaction history

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.

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 SMB-FA Consumer chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SMB-FA Consumer share?	Can you limit this sharing?
For our everyday business purpose – Such as to process your transactions, maintain your accounts(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – To offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
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
For nonaffiliates to market to you	No	We don't share

Questions?

Call 1-833-624-8400

Who we are

Who is providing this notice?	Fidem SMB Holdings LLC and Fidem SMB LLC (together “SMB-FA Consumer”)
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What we do

How does SMB-FA Consumer protect my personal information?	<p>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.</p> <p>We authorize our employees to get your information only when they need it to do their work, and we require companies that work for us to protect your information.</p>
How does SMB-FA Consumer collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ■ Provide account information or use your debit card ■ Give us your income or your contact information ■ Pay your bills <p>We also collect personal information from others, such as credit bureaus, affiliates, or other companies.</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 – information about your creditworthiness ■ Affiliates from using your information to market to you ■ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>SMB-FA Consumer does not share with our affiliates.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>SMB-FA Consumer does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>SMB-FA Consumer doesn't jointly market.</i>

Other Important Information

For Vermont Customers.

- We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.
- For additional information concerning our privacy policies, call 1-833-624-8400.

For California Residents

Under the California Consumer Privacy Act, California residents have the right to:

- Request that a business delete any personal information about the consumer which the business has collected from the consumer.
- Request that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:
 - The categories of personal information that it has collected about that consumer.
 - The categories of sources from which the personal information is collected.
 - The business or commercial purpose for collecting or selling personal information.
 - The categories of third parties with whom the business shares personal information.
 - The specific pieces of personal information it has collected about that consumer.
- Request that a business that sells the consumer's personal information, or that discloses it for a business purpose disclose, free of charge, to the consumer:
 - The categories of personal information that the business collected about the consumer.
 - The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal was sold, by category or categories of personal information for each third party to whom the personal information was sold.
 - The categories of personal information that the business disclosed about the consumer for a business purpose.
- Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

You may submit a request under the California Consumer Privacy Act through the following methods:

- You may call us toll-free at 1-833-624-8400.
- You may write to us at PO Box 9213, Old Bethpage, NY 11804-9213.

To submit a request, we are required to verify your identity. Please be prepared to provide us with primary borrower name on the loan, and the last 4 digits of the Social Security number of the primary borrower, and the home telephone number on the account. We will match the personal information that you provide to us with personal information that we already maintain about you in order to verify your identity. We may also need to contact you to confirm your request.

You may also designate an authorized agent to make such requests on your behalf by providing a certified Power of Attorney or Trustee documentation. We will compensate you for any related notarization costs.

We may not be able to honor each request that we receive, but if we are unable to do so, we will respond to let you know our reasons.

We will not discriminate against you if you choose to exercise any of your rights as described in this Privacy Policy.