Consumer Privacy Notice

FACTS

WHAT DOES GROW CREDIT INC. DO WITH YOUR PERSONAL INFORMATION?

Why?

Companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal and state 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, employment information, assets and income
- Account balance and payment history
- Credit history and credit scores

When you are no longer our customer, we continue to share your information as described in this notice.

How?

All companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons we can share our customers' personal information; the reasons Grow Credit Inc. chooses to share; and whether you can limit sharing.

Reasons we can share your personal information:	Does Grow Credit Inc. share?	Can you limit sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), re to court orders and legal investigations, or report to credit bureaus		No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your credit worthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share
Questions? Call Grow Credit Inc. at 1-888-244-5886 or	r go to www.growcredit.com	1

Who we are	
Who is providing this notice?	Grow Credit Inc. 1447 2nd Street, Suite 200 Santa Monica, CA, 90401

What we do	
How does Grow Credit Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal and state law. These measures include computer safeguards and secured files and buildings.
How does Grow Credit Inc. collect my personal information?	We collect your personal information, for example, when you Open an account Pay your bills or apply for an account Make purchases or payments to your account We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Sharing for affiliates' everyday business purposes – information about your creditworthiness Affiliates from using your information to market to you Sharing of nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies, for example affiliated financial service providers, such as insurance agents, dealers that you have requested credit from and savings institutions. • Grow Credit Inc. does not have any affiliates and does not share.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Grow Credit Inc. does not share with nonaffiliates so that they can market to you
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • Grow Credit Inc. may jointly market

Other Important Information

Notice to California Residents: Residents of the State of California have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed personal Information during the preceding year for direct marketing purposes. Alternatively, the law provides that if the company has a privacy policy that gives either an Opt-out or Opt-in choice for use of your personal Information by third parties for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options. Grow Credit Inc. does not share information with affiliates for direct marketing purposes.

To request further information, please send a request to: 1447 2nd Street, Suite 200, Santa Monica, CA, 90401

Grow Credit California Consumer Privacy Act Disclosure

On January 1, 2020, the California Consumer Privacy Act of 2018 (CCPA) became operative. Under the CCPA, covered businesses that collect the personal information of California residents must provide notice regarding their data collection and sharing practices. In addition, the CCPA provides California residents the right to make certain requests with respect to their data.

In the following CCPA Disclosure, the words "we," "us," and "our" refer to Grow Credit, and the terms "you" and "your" refer to California residents who are customers of Grow Credit. The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Disclosure does not apply with respect to personal information that we collect about California residents in connection with providing our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (GLBA)).

California Privacy Rights

Personal Information We Collect.

We collect the following categories of personal information:

- (i) Identifiers such as your name, address, telephone number, Internet Protocol address, email address, driver's license number, social security number, employment history, signatures, or other similar identifies.
- (ii) Certain personal characteristics, such as your gender, age, race, color, national origin and marital status.
- (iii) Internet activity information, such as your browsing history, search history, or your interactions with our website or the Grow Credit mobile application.
- (iv) Geolocation data.
- (v) Professional or employment-related information.

We collect your personal information using various sources, including your interactions with our website, the information you provide to apply for a product or service from us, and information obtained from cookies, pixel tags, web beacons, server logs, or other similar technologies. We collect your personal information to provide the products or services requested by you, to contact you regarding our products and services, and to otherwise enhance your experience with us. As disclosed in our Privacy Policy, we may 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, or report to credit bureaus) and for our marketing purposes to offer our products and services to you. We may also share information about your transactions and experiences with us with our affiliates for their everyday business purposes.

Your Right to Make Requests.

California law permits residents of California to request certain details about how their information is collected, disclosed, and sold to third parties.

Under the CCPA, 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 to the consumer, free of charge, the following:
 - 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 information 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.

We do not sell your personal information to third parties or disclose your personal information to third parties for a business purpose. To exercise any of your other rights above, you may contact us by calling us toll-free at 1-888-244-5886 or by emailing us at behappy@growcredit.com. We may request up to three pieces of personal information about you when you make a request to verify your identity. Only you, or an authorized agent acting on your behalf, may make a verifiable consumer request related to your personal information. To use an authorized agent to submit a request to us, you must (i) provide the authorized agent signed permission to make a request on your behalf; (ii) verify your identity with us; and (iii) directly confirm with us that you provided the authorized agent permission to submit the request.

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We will verify your consumer request by comparing the information you provide to us against our records, which may include requesting that you provide us with your name, address, and phone number.

You have the right not to be discriminated against for your exercise of the privacy rights conferred by the CCPA. We will not discriminate against a consumer because the consumer exercises any of the consumer's rights as described in this CCPA Disclosure. However, we reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified, to the extent your rights adversely affect the rights and freedoms of others, or where the CCPA allows us an exemption, such as when we are required to comply with federal, state, or local laws.

Contact Us.

If you should have any questions or concerns about this CCPA Disclosure or our privacy practices, please contact us at 1-888-244-5886 or by emailing us at behappy@growcredit.com.