

FIRST STAR CREDIT, LLC

ONLINE PRIVACY POLICY

Last Modified: December, 2022

INTRODUCTION

This General Privacy Policy (the "Privacy Policy") is provided by First Star Credit, LLC ("First Star Credit", "we", and/or "us").

This Privacy Policy applies to the Personal Information you provide to us or that we collect through our websites, including [web address], (the "Site") and through our other online services, websites, applications, and related services that link to this Privacy Policy (collectively with the Site, the "Services"). By accessing or using our Services, you agree to the collection, use, and processing of your Personal Information as set forth in this Privacy Policy.

In this Privacy Policy, "Personal Information" means any information relating to an identified or identifiable individual.

Note that the Services are often accessed or connected through other third-party service providers and their related applications and services ("Service Provider Application"), and this Privacy Policy only covers the information that First Star Credit collects, uses, and shares to provide the Services, and does not explain what a Service Provider Application does with any Personal Information we provide to them (or any other information they may collect about you separately from First Star Credit). This Privacy Policy also does not cover any websites, products, or services provided by others. We encourage you to review the privacy policies, terms of use, or notices of any Service Providers for information about their practices.

CHILDREN UNDER THE AGE OF 13

You must be at least 18 years old to use our Services. We do not knowingly direct our Services to individuals under 18 years old ("Minors"), nor do we knowingly collect, use, or disclose Personal Information about Minors who use our Services. If you use our Services, you represent that you are at least the age of majority under the laws of the jurisdiction of your place of residence. If you believe a Minor has provided us with Personal Information, please alert us at firststarcredit.customerservice@account-servicing.com. If we learn that we have collected Personal Information from a Minor, we will promptly take steps to delete such information.

INFORMATION WE COLLECT ABOUT YOU & HOW WE COLLECT IT

INFORMATION YOU PROVIDE TO US. When you connect your account from your relevant bank, financial institution, payroll provider, or other entity that provides your financial account ("Financial Account") through the Services or when you request the Services directly from us, you may provide (and we may collect) the following categories of Personal Information:

- Authentication information, such as credentials, username, password, security questions and responses, Personal Identification Numbers (PINs), multi-factor authentication responses, security tokens, and/or other information required to authenticate you to connect your Financial Account(s) through the Services.
- Product and service information, such as registration and payment information, first name, last name, email, phone number, date of birth, social security number.
- Professional information, including information about your employer and income, in cases where you've provided us with your pay stub or W2 information.

INFORMATION WE COLLECT FROM YOUR FINANCIAL ACCOUNT. After you have successfully connected your Financial Account(s) through the Services, we will access and collect information from your Financial Account on your behalf. The information we will collect from your Financial Account will vary depending on the specific third-party services you are using (e.g., income verification or financial management applications), the information available from the Financial Account, and other factors. We will collect the following categories of Personal Information from your Financial Account, which includes information from all accounts accessible through a single set of credentials to a Financial Account (e.g., checking, savings, and credit card):

- Account identifying information, including, account name, financial institution name, payroll provider name, account type, account ownership, branch number, account number, and routing number;
- Balance information, including current and available Financial Account balance;
- Revolving credit account information, including balance owed, due date, payment amounts and dates, transaction history, credit limit, repayment status, and interest rate;
- Payroll account information, including employer details, employment description, W2 and tax related information, income amount and dates paid, and amounts withheld for taxes, benefits, and insurance;
- Loan account information, including due dates, repayment status, balances, payment amounts and dates, interest rate, guarantor, loan type, payment plan, and terms;
- Investment account information, including transaction information, type of asset, identifying details about the asset, quantity, price, fees, and cost basis;
- Identifying information about the account owner(s), including name, email address, phone number, date of birth, and address information; and

- Transaction information, including merchant, amount, date, payee, type, quantity, price, location, involved securities, and a memo or description of the transaction.

INFORMATION WE COLLECT FROM YOUR DEVICES. When you use the Services on your device (e.g., computer, phone, tablet) we may automatically collect information about your use of the Services, including via cookies and similar technologies (collectively "cookies"), such as internet protocol (IP) address, device location, time zone setting, hardware model, operating system, the features within our Services you access, browser data, and other technical information about the device. Please review our Cookie Policy for more information about how we use cookies and your options related to cookies.

INFORMATION WE RECEIVE ABOUT YOU FROM OTHER SOURCES. When you use the Services in connection with a Service Provider Application or in the process of connecting your Financial Accounts to our financial institution partners, we may receive identifiers and commercial information about you directly from a Service Provider Application, our financial institution partners, or other third parties including our service providers and identity verification services. For instance, Service Provider Applications (e.g., lenders or payment processors) may provide information to First Star Credit such as your full name, social security number, date of birth, email address, phone number, or information about your financial accounts and account transactions, and our financial institution partners or service providers may provide information such as the status of a transaction you have initiated.

HOW WE USE YOUR INFORMATION

We will use your Personal Information in a manner consistent with this Privacy Policy. Specifically, we will use the Personal Information we collect from you:

- To provide, maintain, improve, and enhance our Services;
- To verify your identity, which is required to give you access to our Services;
- To verify your accounts and establish the requested Service with the service provider(s) of your choice, including financial institutions, brokerage houses, technology providers, payment providers and credit card companies;
- To provide you with certain information that we derive from your Personal Information, such as your income based on your pay checks;
- If you subscribe to a Service requiring payment, to process the initial payment and all subsequent payments;
- To help us improve and personalize the content and functionality of our Services;
- To help us understand your usage of the Services to improve the Services;
- To communicate with you regarding customer service matters, questions and other various comments you may send to us;

- To inform you about products, services, offers, and events we offer or sponsor, and to provide news and other information we believe may interest you;
- To communicate various technical and administrative messages regarding the Services, including notices of technology updates;
- To generate de-identified and/or aggregated data that we may use for any lawful purpose;
- To offer you the option to participate in contests or surveys regarding the Services;
- Auditing related to a current interaction with the consumer and concurrent transactions;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration;
- To maintain legal and regulatory compliance;
- To enforce compliance with our Terms and Conditions and Policies; and
- For any other purpose disclosed to you at the time we collect or receive the Personal Information, or otherwise with your consent.

DISCLOSURE OF YOUR INFORMATION

We provide services to or utilize third-party services that may have access to your Personal Information for a variety of business purposes. We only provide your Personal Information to a third party after such third party has signed a confidentiality contract with us, and we provide your Personal Information to such third parties only for our business purposes. The Personal Information you provide to us will be shared in the following circumstances:

- With your consent and at your discretion;
- With Service Provider Applications or our approved partners with whom you have enrolled for services;
- With third-party service providers that we employ to provide marketing, security, development, or other business processes, or to provide services on our behalf;
- With other entities within the Mastercard group;
- When we reasonably believe such disclosure is required to comply with the law, an investigation, or other legal process, such as a court order or a subpoena; or
- To service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

We may use, share, or publicly disclose or otherwise process your information that has been de-identified, anonymized and/or, aggregated (so that it does not identify you

personally) for any purpose permitted under applicable law, including for research and the development of new products.

CHOICES ABOUT HOW WE USE AND & DISCLOSE YOUR PERSONAL INFORMATION

Some jurisdictions require us to disclose the legal basis on which we rely to use or disclose your Personal Information. To the extent those laws apply, our legal bases are as follows:

- **Consent:** Where required by law, and in some other instances, we handle your Personal Information on the basis of your consent.
- **Our contractual obligations to you:** Our handling of your Personal Information is to meet our contractual obligations to you, or to take steps at your request in anticipation of entering into a contract with you. Our contractual obligations to you may include the creation of your account and the provision of the Services to you.
- **We have a legal obligation to use your Personal Information:** For example, we may use your Personal Information to comply with tax and accounting obligations, or with a court order.
- **Legitimate Business Interest:** We handle your Personal Information to provide you with our Services and to accomplish our legitimate business purposes (e.g., to improve our Services and for product development purposes). We only rely on our or a third party's legitimate interests to process your Personal Information when these interests are not overridden by your rights and interests.

DATA SECURITY

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you or where you have chosen a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website. The information you share in public areas may be viewed by any user of the Website.

If you receive an unsolicited email or other electronic communication that appears to be from us but have reason to believe it is from another source and may be fraudulent, then call us at 380-390-6018 or email us at firststarcredit.customerservice@account-servicing.com.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

The Company is not responsible for third parties' (companies to which we link from our Website or browser plugins) online security practices. In most cases, we provide links to non-Company websites solely to help you find more information about topics that interest you. Third-party websites may have different privacy policies and/or security standards to govern their sites; we encourage you to learn about their privacy and security policies and practices.

DATA RETENTION

We will retain your Personal Information for as long as necessary for the business or commercial reason(s) for which it was obtained or as specified by any ongoing retention requirements found in the law. The manner in which we review our retention requirements for our customers is: (i) the length of time and type of service with our client and provide the Services; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

YOUR RIGHTS AND CHOICES

You may decline to share certain Personal Information with us, in which case we may not be able to provide to you some of the features and functionalities of our Services. Where required by applicable law, we will indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. Depending on your country or state, you may have the right or choice to access, amend, or delete any Personal Information we hold about you, opt out of, object to, or restrict some uses of your Personal Information, and withdraw any consent provided. To exercise these rights, you may contact us using the contact details at the end of this Policy.

CHANGES TO OUR ONLINE PRIVACY NOTICE

We may revise this Privacy Policy or our practices with respect to how we collect, use, and process Personal Information at any time and in our sole discretion. If we make any material changes to how we treat our customers' Personal Information, we will attempt to notify you by email to the primary email address specified in your account, through a notice on our website's home page, or through other means. You are responsible for ensuring we have an up-to-date, active email address by which to contact you. You are advised to review this Privacy Policy periodically for any changes. Your continued use of our Services after such modifications will constitute your acknowledgment of the modified Privacy Policy and your agreement to abide and be bound by the modified Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

CONTACT INFORMATION

To ask questions or comment about this Notice and our privacy practices, contact us by telephone at 1-888-501-1790, or you can email us at firststarcredit.customerservice@account-servicing.com.