

# Privacy Policy

**Updated: September 20, 2023**

Our Privacy Policy is designed to assist you in understanding how we collect, use and share your personal information and to assist you in making informed decisions when using our website (the “Site”) and our products and services (the “Services”). By using or accessing the Site or Services you consent to our data practices as described in this Privacy Policy.

## **WHAT INFORMATION DO WE COLLECT?**

When you visit the Site you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis and technical data about your prior journey, device and how you interact with our Site.

**Personal Information You Choose to Provide.** In certain sections of the Site and when you use our Services, we may enable you to request information, complete a registration form, or perform other similar activities. Due to the nature of some of these activities, we may collect personal information that you choose to submit such as your name, contact data (address, email address, phone number), financial information and other similar information. We may also collect additional personal information that you voluntarily include in your interactions with the Site, transmit with your communications to us, including when you call us. We refer to the information that you elect to provide as “Provided Attributes”.

**Technical Data.** In most cases when you come to the Site we will automatically gather or receive technical data about your prior journey, device and how you interact with our Site (“Technical Data”). Technical Data may include browser type, referrer URL, date and time of your visit, IP address, MAC address, device type, screen resolution, and OS version. Technical Data also includes cookies and similar identifiers described in more detail below in the “Cookies and Other Technologies” section. This information may include the date and time of visits, the pages viewed, time spent at the Site, activities conducted on the Site and the websites visited just before and just after the Site. We also work with third-party vendors in

operating and improving the Site and managing our advertising, described in more detail below in the “Third Party Vendors” section.

**Personal Information provided by Service Providers.** In some cases, we may receive your personal information (such as your email address) from our service providers. We may use this personal information to market our business or identify lookalike audiences.

**Personal Information received from Third Party Sites.** We may also combine information we collect about you when you visited our social media pages and later visited our Site.

## **HOW DO WE USE THE INFORMATION THAT WE COLLECT?**

**Primary Use.** If you use our Site to request information, we will connect you with companies in our Approved Partner Network (“Partners”) to process and fulfill your request. To do so, we will use the Provided Attributes you elected to share with us to determine which companies can help you and we will share your Provided Attributes with those companies. This is the primary use of data on our Site.

**Consent to Being Contacted.** By submitting your request, or participating in messaging via the Site or any of our social media pages, you understand that our Partners may contact you by messenger, telephone, automated calling, mobile device, email, or regular mail based on the information you provided to us to process and fulfill your request, even if you have opted into the National Do Not Call List administered by the Federal Trade Commission, any state equivalent Do Not Call List, or the Do Not Call List of an internal company. If a Partner contacts you and you wish not to be contacted again by that Partner with respect to your inquiry, then you should specifically make a request to that Partner not to contact you again. Please note that our Partners may maintain the information you provided whether you elect to use their services.

**Business Uses.** We may also use the data we collect about you to (i) respond to your requests (e.g., receive white papers, email, phone calls or texts); (ii) keep you informed of our products and services (and those of our Partners); (iii) send you marketing communications; (iv) improve our Sites and business; (v) fulfill any purchase you make; and (vi) use your

data in an aggregated, non-specific format for analytic and demographic purposes.

**Site Performance.** We use Technical Data to monitor this Site's performance, analyze traffic patterns and usage, ensure that this Site and any transactions function properly, and gather demographic information about our user base as a whole.

**Audience Targeting.** We may also use your personal information such as email address to identify similar users who may be interested in our services and may not currently be users of our Site. We use services like Facebook and Google Audience Targeting to identify users who are similar to our existing users based on your email address and social media profile. If you are a person who is identified as similar to any of our existing users, you may receive targeted advertisements on Facebook or Google about our services and the services of our affiliates. If you would like to opt out of this kind of targeted advertising by social media sites, go to those social media sites to view your options. If you are an existing user, you can opt out of us using your email address for audience targeting by going to Access & Control below.

**Other Legal Uses.** We may also use your personal information if necessary (a) to comply with law or a subpoena; (b) to respond to requests from governmental authorities; (c) to enforce our terms of use and privacy policy; and (d) to protect our business and the rights of others, including for fraud protection and security purposes.

## **COOKIES AND OTHER TECHNOLOGIES**

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites.

As you use the Site, the website uses its cookies to differentiate you from other users. Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting the Site and which

parts of the Site are most popular. This helps us gather feedback to constantly improve the Site and better serve our customers. We do not generally store any personal information that you provided to us in your cookies.

**Analytics.** We use Google Analytics on the Site; information on how Google Analytics collects and processes data can be found at <https://www.google.com/policies/privacy/partners/>. In addition, we have enabled certain Google Analytics advertising features that use cookies. These features enable us to obtain certain demographic and interests data for visitors to the Site. You can opt out of these features by visiting <https://www.google.com/settings/u/0/ads>.

**Remarketing.** We may use Google AdWords remarketing to trigger advertisements across the Internet. AdWords remarketing will display relevant ads tailored to you based on what parts of the Site you have viewed by placing a cookie on your machine. The cookie is used to say "This person visited this page, so show them ads relating to that page." Google AdWords remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you. If you do not wish to participate in our Google AdWords remarketing, you can opt out by visiting <https://www.google.com/settings/ads/onweb/>.

In addition, we may use other online ad networks that place anonymous cookies on your computer, and use similar technologies, in order to understand your interests based on your (anonymous) online activities, and thus to tailor more relevant ads to you. If you do not wish to receive such tailored advertising, you can visit <https://www.networkadvertising.org/choices/> to opt out of most companies that engage in such advertising. This will not prevent you from seeing ads; the ads simply will not be delivered through these targeting methods.

**Social Media.** Our Site may include social media features, such as Facebook or Twitter buttons. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

**Opting Out.** To opt out of cookies, see the Access and Control section below.

**Audience Targeting.** Our service providers (e.g., Facebook and Google) may also use pixel tags to create custom audiences. A custom audience pixel is a piece of JavaScript code that is incorporated into each of our web pages. This pixel records information about the way visitors use our website and is sent to our service providers (e.g., Facebook and Google). We allow our service providers to use this information so that we can address our visitors for commercial purposes using advertisements (e.g., Facebook and Google ads). To opt out of Facebook's and Google's pixel, go to Facebook.com and Google.com, or go to the Third Party Vendors section below for more information on opting out of their data practices.

We do not respond to browser Do Not Track (DNT) signals at this time.

## **DATA SHARING**

In addition to the primary data use described above (i.e., sharing your data with our Partners for the purpose of providing you with information about the products and services you are seeking), we may share your data as follows: (i) with affiliates of our business; (ii) with service providers who assist us in compliance and verification activities or provide services such as payment processing, IT, email sending, data analysis, and marketing services; (iii) if you choose to send a message through, or contribute to public areas of, this Site (e.g., message boards, blogs); and (iv) with a third party in the event of a sale or transfer of all or part of our business.

We may also disclose your personal information in connection with the Other Legal Uses described above under How Do We Use The Information That We Collect.

## **THIRD PARTY VENDORS**

We also work with vendors and partners in operating and improving the Site. These vendors and partners include advertising and web analytics companies (including Google and Facebook). These partners and vendors use cookies, web beacons and other technologies to collect information about your online activity (e.g., the sites and pages you have visited at the Site and at times other third-party sites) to help manage ad campaigns,

understand user interests and trends and deliver personalized content and advertising to you while you are on the Site or on other sites. In addition, some of our service providers (e.g., Facebook and Google) may also use pixel tags to create custom audiences. See Cookies and Other Technologies above for more information about technologies used by our service providers, including custom audience pixels.

Our privacy policy does not cover any use of information that a third-party vendor may collect from you. These companies have their own policies regarding record keeping and data retention.

PLEASE NOTE THAT WE ARE NOT RESPONSIBLE OR LIABLE FOR THE ACTS AND/OR OMISSIONS OF THIRD-PARTY VENDORS.

### **THIRD PARTY SITES**

Please remember that when you use a link to go from the Site to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites that have a link on the Site, is subject to that website's own rules and policies. Please read those rules and policies before proceeding. The inclusion of a link on the Site does not imply endorsement of the linked site by us or by our affiliates.

### **SECURITY**

The security of your personal information is very important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. We may employ procedural and technological security measures that are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

### **ACCESS & CONTROL**

**Opting Out of Cookies.** If you do not want information collected through the use of cookies (including targeted advertising), there is a simple procedure in most browsers that allows you to decline the use of cookies.

To learn more about cookies (including how to disable cookies), please visit <http://www.allaboutcookies.org/>. Note that the opt-out only applies to the applicable browser and device in which you set it. You will need to opt out on all of your browsers and all of your devices. For more information about exercising choice regarding the use of your information via cookies, please go to [optout.aboutads.info](http://optout.aboutads.info) or [www.aboutads.info/choices](http://www.aboutads.info/choices).

You can also set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable, delete or refuse cookies, please note that some parts of this Site may not function properly. When you disable or delete cookies you are also deleting any opt-out cookies you may have set on that browser or device. You will need to re-set opt outs after you have disabled or deleted your cookies on that browser or device. For example, if you have opted out of targeted advertising, and later you delete your cookies, you will need to re-set that opt out for targeted advertising.

**Access and Deletion.** You may contact us as indicated under the Contacting Us section below and request that we provide you with information about our data practices or that we delete your personal information that we maintain on our systems. We will respond to your request within a reasonable timeframe. If you are a California resident, see your additional rights under CCPA Rights below. Non-California residents may also use the California-specific access, deletion, portability and opt-out features on our Site (see CCPA Rights below), but by using those features, non-California residents are not entitled to the same protections and rights as Californian residents.

### **ChatBot Disclosure**

Our chat bot is enabled by ManyChat. The ManyChat framework is a set of web-services that enable intelligent services and connections using conversation channels you authorize. As a service provider, ManyChat will transmit content you provide to our bot/service in order to enable the service. For more information about ManyChat privacy policies please see their privacy statement here: <https://manychat.com/privacy.html>. In addition, your interactions with this bot/service are also subject to the conversational channel's applicable terms of use, privacy and data collection policies.

**California Residents.** If you reside in California, see the section on CCPA Rights below for additional rights.

### **RETENTION PERIOD**

In general, we will retain your data for as long as is needed to fulfill the uses outlined in this Privacy Policy, including to connect you with Partners who can provide you with information about the products and services you are seeking.

### **USE OF SITE BY MINORS**

We do not knowingly collect any information from anyone under 18 years of age. Our Services are directed to and intended for people who are at least 18 years old.

### **NO SENSITIVE INFORMATION**

Please do not share with us any sensitive information such as social security number, information related to race or ethnicity, political opinions, religion or other beliefs, health, criminal convictions and offenses, trade union membership, or any genetic data, biometric data, or information relating to an individual's sex life or sexual orientation.

### **CONTACTING US**

If you have any questions or concerns about this Privacy Policy, you may contact us by email to [info@aelending.com](mailto:info@aelending.com)

### **UPDATES TO THIS PRIVACY POLICY**

We may update or modify this Privacy Policy from time to time. The date of the latest update will be stated at the beginning of this Privacy Policy. If there are material changes to this Privacy Policy or in how we will use your personal information, we will post such changes to the Site. If you do not agree with the changes to how your information will be used, please do not continue to use this Site or Services. Your continued use of the Site or our Services represents your consent to our data practices. Where required by law, we will obtain your consent or provide additional disclosures, to make the changes.



## **INFORMATION FOR CALIFORNIA CONSUMERS**

The California Consumer Privacy Act (“CCPA”) affords certain rights and protections to California residents. This section is intended to further describe:

1. the categories and sources of personal information that we collect, sell or share;
2. the purpose for collection;
3. the types of third parties to whom we disclose and sell that information; and
4. details about how California residents can exercise their rights under the CCPA.

Non-California residents may also use the California-specific access, deletion, portability and opt-out features on our Site (see CCPA Rights below), but by using those features, non-California residents are not entitled to the same protections and rights as California residents.

### **Categories of Data We Collect**

We collect the following CCPA categories of personal information (as that term is defined under the CCPA):

1. identifiers, such as a name, email address, telephone number, postal address, unique personal identifier, online identifier, and IP address.
2. protected classification characteristics under California law, such as veteran or military status;
3. commercial information, such as products or services obtained or considered
4. internet activity, such as browsing history and search history
5. geolocation data;
6. inferences drawn from some of the information above (e.g., email open rates and time).

We generally collect the above data as Technical Data or Provided Attributes. For example, we do not create user profiles to determine the gender, marital status or employment status of consumers.

### **Data Sources**

**Us:** We collect Technical Data and Provided Attributes from consumers who land on or engage with our Sites or other properties we own (e.g., in response to emails from us or on our behalf).

**Service Providers:** We engage service providers to perform a variety of functions (e.g., verifying consumer consent, validating email addresses or phone numbers).

**Authorization:** We require all parties from whom we receive data, whether they are Partners, Service Providers or other third parties, to represent and warrant to us that they have appropriately obtained the data provided to us and have the authority to share the data with us.

### **Purpose for Data Collection**

We use your data for the purposes described above in “How Do we Use the Information That We Collect.” We primarily use the data we collect to connect consumers with Partners who can provide information about the products and services those consumers are seeking.

### **Categories of Third Parties with Whom we Disclose Personal Data**

In addition to the sharing for the primary use described in “Data Sharing,” we may share your data with other businesses we own or under common ownership, service providers, and third-party websites.

### **Categories of Data Sold**

As described above in the “How Do we Use the Information That We Collect” and “Data Sharing” sections, we may transfer Technical Data and Provided Attributes to our Partners who can provide the consumer with information about the products and services they are seeking. We may receive a fee for the transfer of that data or when the consumer purchases a product or service. In addition, our use of analytics and targeting cookies of service providers on our Site may be viewed as a “sale” of your personal information.

### **CCPA Rights**

The CCPA affords certain rights and protections to California residents including:

1. the right to request that we delete any personal information that we have collected from you (“Right to Delete”);
2. the right to request that we disclose the following with respect to the past 12 months:
  1. the categories of personal information collected or sold,
  2. the specific pieces of personal information collected and sold,
  3. the categories of sources of such collection,
  4. the categories of personal information disclosed for a business purpose,
  5. the categories of third parties with which we shared or sold personal information, and
  6. the right to port or transmit this information (“**Right to Know and Port**”); and
3. the right to direct us not to sell their “personal information” (“**Right to Opt-Out**”).

The CCPA temporarily exempts from these CCPA rights certain personal information reflecting a written or verbal business-to-business communication or transaction as well as data about our employees, job applicants, contractors, controlling owners, directors, and officers in their capacities as such individuals.

California residents who would like to submit a Request to Know and Port, Delete, or Opt-Out should contact us via the below. Upon submission, you will be asked to verify your email address. If we are able to verify your Request to Know and Port or Delete or Opt-Out, (e.g., that you are a California resident and that we have or have sold, as the case may be, your personal information), we will respond within 45 days of your submission (or such additional time period as the law allows us). You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

- Contact us via email to: [info@aelending.com](mailto:info@aelending.com)

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. When you use an authorized agent to submit a request, we may require you to provide the agent your signed permission to do so, verify your own identity directly with us, or directly confirm with us your authorization. You may also provide us with a power of attorney for your agent.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your rights under the CCPA. You have the right not to receive discriminatory treatment for the exercise of the privacy rights under the CCPA.