

# Walnut Privacy Policy

## 1. About This Policy

This Privacy Policy (the "Policy") describes the information Walnut Financial, Inc. ("Walnut") collects about you, how we use and share that information, and the privacy choices we offer. This Policy applies to information we collect when you open an account through Walnut, access or use our website, products, and services (collectively, the "Services"), or when you otherwise interact with us. This includes information we collect when you apply for a loan with Walnut and while we service that loan.

The terms "Walnut," "we," "us," or "our" mean Walnut Financial, Inc. "You" or "your" means an individual who visits or uses our Services. The term "Site" includes (1) all websites operated by Walnut that collect personal information from you and that link to this Privacy Policy, and (2) all pages within each such website, device, or mobile application, any equivalent, mirror, replacement, substitute, or backup website, device, or mobile application. By using our Services or visiting our websites, you acknowledge and agree to the terms of this Policy.

## 2. Information We Collect and Disclose

Walnut collects personal information about you for a variety of purposes. We collect information directly from you, and we may collect information about you from third parties, such as credit reporting agencies, or collect it automatically when you use the Site.

Depending on how you interact with us, we may collect various types of information. For example, when you apply for or receive a loan, we may collect:

- Personal Identifiers, such as a full name, postal address, email address, online usernames and passwords for third-party sites and internet services, social security number, driver's license number, or other similar identifiers.
- Account-related data, such as account numbers, credit/debit card number, account history, account balances, loan details, vehicle or property information, information about co-applicants or guarantors, and other information related to your Walnut accounts, applications, or prequalification inquiries.
- Transaction data such as payment or transaction history and third-party billing information or statements.
- Credit report information, such as your credit score, credit history, and other information that we receive from credit reporting agencies.
- Internet or other network activity information, such as information regarding how individuals interact with the Site, emails, or marketing materials.
- Professional or employment-related information.
- Commercial information, such as products or services purchased, obtained, or used.
- Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics.

When you browse our website, we may also collect:

- Device data, such as the unique device identifier assigned to that device by phone makers, carriers, or makers of the operating system (the "Device ID"). Device IDs allow app developers,

and others to uniquely identify your device for purposes of storing application preferences and other data.

- Information collected by cookies and web beacons. Cookies are small data files that are stored on your hard drive or in device memory by a website. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. We may also collect information using web beacons. Web beacons are electronic images that may be used in our Services or emails. We may use web beacons to deliver cookies, count visits, understand usage, and determine whether an email has been opened and acted upon.
- Technical and navigational information, such as your computer browser type, Internet protocol address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our web design and functionality.

We may also collect information about you from mailing list providers, publicly available sources, identification verification services and other third parties.

We disclose these categories of personal information listed above for our business purposes. We do not, however, sell personal information to third parties.

### **3. How We Use Your Information**

We may use the information you provide about yourself and about your Walnut accounts to fulfill your requests for our products, programs, and Services, to respond to your inquiries about our Services, and to offer you other products, programs, or services that we believe may be of interest to you.

We may use your information to complete transactions you request, to verify the existence and condition of your accounts, or to assist with a transaction. For example, we may use the account information you provide or that we collect from Third-Party Sites to confirm your accounts are valid and to access funds from your accounts in connection with fulfillment of the Services.

We may use your information to improve and personalize the Services. For example, we may use your information to pre-fill form fields on the Sites for your convenience.

### **4. How We Share Your Information**

We may share personal information about you as follows:

- With third parties to provide, maintain, service and improve our Services.
- To process transactions that you authorize or to fulfill your requests.
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of our business.
- To respond to subpoenas, court orders, or legal process.
- In order to investigate, prevent, defend against, or take other action regarding violations of our Terms of Use, illegal activities, suspected fraud, or situations involving potential threats to the legal rights or physical safety of any person or the security of our network, Sites or Services.
- the legal rights or physical safety of any person or the security of our network, Sites or Services.
- To respond to claims that any posting or other content violates the rights of third parties.

- In an emergency, to protect the health and safety of our Sites' users or the general public.
- As otherwise required by law.
- As you direct in writing.

## 5. How We Secure Your Information

We take your privacy and the security of your information very seriously, and have an information security program that includes administrative, technical, and physical measures to protect your information. Examples of measures we have taken to protect your information include, but are not limited to:

- The use of encryption while transmitting and storing information.
- Mobile application session timeouts to ensure your information is protected when you put down your device without logging out.
- Passwords and personal identification numbers (“PINs”) are only known by you. No employee, contractor or Third-Party Site has access to your Walnut password or PIN. We will never ask for your password or PIN through our customer service teams.
- Two-factor authentication is provided to ensure your account can only be accessed by the device you register with.
- Our systems are periodically audited for security flaws.

## 6. Note on Communication

We may provide you with information and summaries of your accounts and Services through email, SMS and mobile notifications. We may also allow you to subscribe to email newsletters and from time to time may transmit emails to you promoting Walnut or third-party goods or services.

Subscribers have the ability to opt out of receiving our promotional emails and to terminate their newsletter subscriptions by following the instructions in the emails. Opting out in this manner will not end transmission of service-related emails, such as information and summaries of your accounts and Services.

## 7. How to Update Your Information

If you wish to access personal information that you have submitted to us or to request the correction of any inaccurate information you have submitted to us, you may correct certain information through our Site. Alternatively, you can send an email that includes your contact information to [insert email address] to request any corrections to your personal information.

You may also email us if you wish to close your account, but even after you close your account, we may retain archived copies of information about you for a period of time that is consistent with applicable law.

## 8. How We Update Our Privacy Policy

We reserve the right, at our discretion, to make changes to this Policy from time to time, so please review it frequently. You may review updates to our Terms of Use and Privacy Policy at any time via links

on [www.hellowalnut.com](http://www.hellowalnut.com). You agree to accept electronic communications and/or postings of revised versions of this Policy on [www.hellowalnut.com](http://www.hellowalnut.com) and agree that such electronic communications or postings constitute notice to you of the revised version of this Policy. Changes take effect immediately upon posting.

## **10. Everything Make Sense?**

If you have questions or concerns regarding this Policy, or if you have any questions or suggestions, please contact [insert email address].

## Federal Privacy Notice

|       |   |
|-------|---|
| FACTS | WHAT DOES Walnut Financial, Inc. (“Walnut”) 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: <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Employment information and income</li> <li>• Account balances</li> <li>• Account transactions and transaction history</li> <li>• Checking account information</li> </ul> |
| 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 reason Walnut chooses to share; and whether you can limit this sharing.  |

| Reasons we can share your personal information  | Does Walnut share? | Can you limit this sharing? |
|---|--------------------|-----------------------------|
| For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations | Yes                | 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 to market to you   | No                 | We don’t share              |
| For nonaffiliates to market to you  | No                 | We don’t share              |

|            |   |
|------------|---|
| Questions? | Call us at 844-606-0999 or email us at <a href="mailto:support@hellowalnut.com">support@hellowalnut.com</a> |
|------------|---|

|                               |  |
|-------------------------------|--|
| Who we are                    |  |
| Who is providing this notice? | Walnut is providing this privacy policy and it applies to all loans made by the company and all products and services offered in connection with such loans. |

|            |
|------------|
| What we do |
|------------|

|  |   |
|--|---|
| How does Walnut protect my personal information?                                   | To protect your personal information from unauthorized access and use, we use security measures that comply with industry standards. These measures include computer safeguards and secured files and buildings.  |
| How does Walnut collect my personal information?                                   | We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• Apply for a loan</li> <li>• Give us your income information</li> <li>• Make a payment</li> <li>• Provide account information</li> <li>• Provide employment information</li> <li>• Use our website</li> </ul>   |
| Why can't I limit all sharing?   | You have the right to limit only <ul style="list-style-type: none"> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> <li>• for joint marketing with other financial companies</li> </ul> <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> |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account.  |

|                 |  |
|-----------------|--|
| Definitions     |  |
| Affiliates      | Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Walnut does not share with affiliates.</li> </ul>                                       |
| Nonaffiliates   | Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Walnut does not share with nonaffiliates so that they can market to you.</li> </ul> |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Joint marketing partners can include institutions such as consumer lenders or marketers.                    |