

Privacy Policy

Lavan Financial Group LLC (hereinafter referred to collectively and individually as “LFG”) (“LFG,” “we,” or “us”) take the confidentiality of your personal information very seriously and are committed to protecting your privacy. Our Privacy Policy explains how we collect, use, disclose, and protect information that relates to our Service, and outlines your choices about the collection and use of the information you choose to provide.

1. Description of Information We Collect.

We collect information that can help identify you that may include your name, address, telephone number, date of birth, mobile phone number, e-mail address and Social Security Number ("Personally Identifiable Information" or "PII"). We may also collect certain demographic information including income and location, as well as data about your online activity on our website that does not specifically identify you ("Non-Personally Identifiable Information" or "Non-PII"). PII and Non-PII are known together as "Information". We may also collect and store Information that you provide to us about other people (such as co-borrowers), including their name, address, telephone number, date of birth, mobile phone number, email address and Social Security Number. We may combine non-personal information with Personal Information, but we will treat the combined information as Personal Information as long as it is combined.

2. How We Collect Information You Provide.

- a. From You. We collect Information you provide to us in connection with inquiring about or obtaining the products and services of our Lending Partners. The Information we collect from you will vary depending on the product or service requested.
- b. Other Sources. Our Lending Partners may obtain Information about you from third parties such as information about your home and demographic information. None of the information obtained is shared with any service provider relating to your inquiry, rather the information may only be accessed by and disclosed to LFG employees with a legitimate business need to know in

accordance with applicable laws and regulations. Information such as Social Security Number (SSN), date of birth, address and phone number may be verified by third parties to assist in the prevention of identity theft, consumer identification and verification. LFG does not alter or change the information you provide in your inquiry form.

- c. Automatic Collection, Cookies and Other Internet Technologies. We may use cookies, web beacons and other standard internet technologies to collect information from your computer and about your activities on our website. We may collect Non-PII from your browser when you visit our website. This information includes, but is not necessarily limited to, your IP address, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us and the referring website address.

A cookie is a small text file that is stored on a user's computer for record keeping purposes. When you visit our website, we may assign your computer one or more cookies to facilitate access to our website, personalize your online experience and record information about your visit. Through the use of a cookie, we also may automatically collect information about your online activity on our website, such as the web pages you visit, the links or advertisements you click on and other actions you take while on our website. The cookies do not store any PII about you. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, please note that some of the features and services of our website may not function properly. We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our site; monitoring online promotions; and anti-fraud and information security purposes.

Other Technologies. We may use web beacons and other standard Internet technologies to track your use on our websites. Web beacons (also known as clear gifs, pixel tags, targeting and re-targeting pixels, third party pixels or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and

are used to track the online movements of web users or to access cookies. We also may include web beacons in e-mail messages or newsletters to determine whether messages have been opened and acted upon.

Online Tracking/Do Not Track Disclosures. Various third parties use tracking technologies in connection with our Site. These technologies may collect information about your online activities on this and other third-party websites or services. We do not control some of these technologies and are not responsible for their activities. By using our site, you consent to the use of any third-party tracking technologies in connection with our website and acknowledge that the contents of this Privacy Policy do not apply to these tracking technologies or practices of such third parties.

Third parties are developing or have developed signals or other mechanisms for the expression of consumer choice concerning the collection of information about an individual consumer's online activities over time and across third-party websites or online services (e.g., browser Do Not Track (DNT) signals). Currently, we do not monitor or take any action with respect to these signals or other mechanisms. When a user visits our website or participates in the services we provide, we do not allow third parties to collect PII about a user's online activities.

3. How We Use Information.

- a. When you submit an inquiry for a loan product or other service offered through this website, and when you click on any button indicating an acceptance or agreement to terms, or a continuance of processing or submission, and when you signify your agreement to proceed, you are consenting, acknowledging and agreeing to the disclosure of your PII, as described herein, with lenders in our network ("Lending Partners") with whom you are or may be matched.

In General. We may use Information to:

- o Deliver the products and services you requested;
- o Manage your customer relationship;

- o Research and analyze your use of, or interest in, our products, services and content and the products, services and content offered by others;
 - o Communicate with you via e-mail, telephone, postal mail and/or mobile devices about products or services that may be of interest to you;
 - o Develop and deliver targeted advertisements;
 - o Manage our business; and
 - o Perform functions as described to you at the time of collection of this information.
- b. Financial Information. Depending on the service requested, we may use financial information to: match you with Lending Partners, provide you with Lending Partners' conditional loan offers (Banks, credit card companies, personal loan providers, etc.) as well as to verify your identity, protect against or identify possible fraudulent transactions, or otherwise as needed to manage our business.

4. With Whom do we Share Your Information

- a. Lending Partners, Service Providers or Other Third Parties. In submitting an inquiry for a loan product or other service offered through this website, when you click on any button indicating an acceptance or agreement to terms, a continuance of processing or submission, you signify your agreement to proceed you are consenting, acknowledging and agreeing to the disclosure of your PII, as described herein, with Lending Partners or other third parties with whom you are or may be matched or to whom your information may be provided. Please note that no hard inquiry of credit will be performed by Finance Factory. Finance Factory's Lending Partners will not perform a hard inquiry of credit unless you authorize them to do so by submitting a completed loan request. Even if you do not provide your Social Security number, Lending Partners may access your credit file to assist in the prevention of identity theft and to verify your request is accurate and complete. Lastly, not all Lending Partners will obtain your

SSN and each Lending Partner has its own requirements, disclosures and consent requirements.

BE AWARE that the Lending Partners with whom you are matched may retain or use your Information whether or not you use their services and you should contact these Lending Partners directly concerning their privacy and information sharing practices which may differ from those of Finance Factory.

- b. LFG reserves the right to disclose your PII, including your email address, without your notice or consent to our affiliated business partners or to any other third party or for any purpose permitted by applicable law. LFG may be compensated for such disclosure. Parties to whom LFG discloses your PII may advertise, market, or make product or service offerings directly to you.
5. Other Situations. We also may disclose your information at our sole discretion:
- a. In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as we reasonably believe is required by law. In such cases, we may raise or waive any legal objection or right available to us.
 - b. When we believe disclosure is appropriate in connection with efforts to investigate, prevent or take other action regarding actual or suspected illegal activity or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; or to enforce our websites' terms and conditions or other agreements or policies.
 - c. In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, asset sale or in the event of bankruptcy.
 - d. In connection with state and/or federal licensing requirements wherein reporting of information regarding your inquiry to the closing of your loan.
6. Subscriptions/Unsubscribe.

When you "submit" information, LFG may send your information to its Lending Partners and associated third parties as provided in the Terms of Use. If at any time you do not wish to continue to receive communications from LFG , or if you wish to opt out of any further sharing of your information, you may submit a written request by emailing Info@LavanFinancialGroup.com. You may also reach out directly to any Lending Partners, providers, etc. with whom you have been matched to notify them of your information sharing preferences and preferred method of contact.

7. Non-Personally Identifiable Information.

We may share Non-PII with third parties in our discretion.

8. Third Party Links and Policies.

Our website contains links to other websites owned and operated by third parties. These third parties and their servers may be located in the United States or in other countries. We do not control, and are not responsible for, the privacy and security practices of these third parties. We recommend that you review the privacy and security policies of these third parties to determine how they handle Information they may collect about you.

9. Special Notice to California Residents. If you are a resident of California, in addition to the rights set forth in this Privacy Policy:

You have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices below.

We are required by the California Financial Information Privacy Act to provide this notice to you annually.

This Privacy Notice applies to Finance Factory and its subsidiaries.

YOUR RIGHTS

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies with which we do business. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with

us. This includes sending you information about some other products or services.

YOUR CHOICES

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies or subsidiaries.

NO, please do not share personal and financial information with your affiliated companies or subsidiaries.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services.

NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

TIME SENSITIVE REPLY

You may make your privacy choice(s) at any time. Your choice(s) will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

To exercise your choices do one of the following:

Please note that in order for us to process your request, the address you provide below must be a California address you've given to us in relation to your account.

Last name (please print): _____

First name: _____

Street address: _____

City: _____ State: _____ ZIP: _____

Mailing Address (if different than the street address):

City: _____ State: _____ ZIP: _____

Signature: _____ Date: _____

We may provide this information in a standardized format that is not specific to you. The designated e-mail address for these requests Info@LavanFinancialGroup.com.

10. Special Notice to Vermont Residents.

We will not share any personal information about you with other Businesses to the extent prohibited by applicable Vermont law or to the extent your prior consent to share is required by applicable Vermont law. For purposes of compliance with the Vermont Consumer Protection Act, if you are a resident of the State of Vermont and would like to opt-out from the disclosure of your personal information to any third-party for marketing purposes, please contact us at Info@LavanFinancialGroup.com. In addition, under Vermont's Fair Credit Reporting Statute, 9 V.S.A. Section 2480e, and the Fair Credit Reporting Rule CF 112, each Lending Partner is required to obtain your consent prior to assessing a credit report. Lending Partners generally may obtain a soft inquiry prior to posting back an offer. Not all Lending Partners will do a soft inquiry and you should note that each form provides that you are providing such express consent upon clicking any "button" for submission of the inquiry and to be matched. Please read each disclosure carefully for each product and/or service sought to ensure you are providing the appropriate consent and that for certain products Lending Partners/providers may in fact perform a hard inquiry of credit and you are providing express consent to the same.

11. Choices about Collection and Use of Your Information.

- a. You can choose not to provide us with certain information, but that may result in the inability to use certain features of our websites or receive certain products or services. Public forums are not intended for the disclosure of PII. To the extent you provide PII in any public forum, it is at your own risk.
- b. Federal and state regulations require that we store completed loan requests for various periods of time. In order to comply with these requirements, we may be unable to delete your information from our database until the expiration of the applicable period.
- c. Opting out of Tracking and Advertising. Please refer to your browser's technical information for instructions on how to delete and disable cookies, and other tracking and recording tools. Note

that disabling cookies and/or other tracking tools prevents LFG from tracking your browser's activities in relation to the Services, and for use in targeted advertising activities by third parties. However, disabling these tracking mechanisms may disable many of the features available through the Services. Should you have any questions about opting out of the collection of cookies and other tracking and recording tools, you can contact us via email at Info@LavanFinancialGroup.com. To opt-out of data provider cookies, please visit the Digital Advertising Alliance ("DAA") website at <http://www.aboutads.info/choices>.

12. How we Protect your PII.

We take industry standard security measures (including physical, electronic and procedural measures) to help safeguard your PII from unauthorized access and disclosure. In addition to the restrictions outlined above, we require employees to comply with information security safeguards, we use encryption in the transmission of your PII between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your PII.

Although we take many precautions to protect your PII, no system can be completely secure. Therefore, we do not promise, and you should not expect, that your PII, searches or other communications will always remain secure. Users should also take care with how they handle and disclose their PII. Please refer to the Federal Trade Commission's website for information about how to protect yourself against identity theft.

13. Changes to this Privacy Policy.

We may update or modify this Privacy Policy to reflect changes to how we will collect, use and/or share Information. Our Privacy Policy will reflect the date it was last updated. If we make material changes to this Privacy Policy, we will notify you either by prominently posting a notice of such changes before implementing them or by sending you electronic notification of the changes. Please check this Privacy Policy each time you use our websites to ensure you are aware of any changes in our

practices. Your continued use of our websites will signify your acceptance of the changes to the Privacy Policy.

14. Visiting our Websites From Outside the United States.

This Privacy Policy is intended to cover collection of information on our websites from residents of the United States. If you are visiting our websites from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

15. No Rights of Third Parties.

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any PII relating to users of our websites.

16. How to Contact Us.

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by e-mail or postal mail as follows:

Lavan Financial Group LLC 6 Landmark Square, Suite 400,
Stamford, CT 06901

OR Email Info@LavanFinancialGroup.com

17. LFG Businesses.

For purposes of this Agreement, "You" or "Your" means the person(s) using the Websites, and/or the goods, facilities or services of LFG ("Site" and/or "Services") and its subsidiaries offered through alternative methods, including persons that allow others to provide information about themselves to LFG, the banks, Lending Partners, financial institutions, providers, and brokers on LFG's network,

providers or partners. "LFG", "us" or "we" means, but is not limited to LFG.

18. Effective Date.

This online Privacy Policy was last modified December 17, 2017.