

Snap Finance LLC and its affiliates, including without limitation Snap RTO LLC and Snap Second Look LLC (collectively “Snap”), respects the privacy of our customers and visitors and the customers and visitors of the financing companies to which we provide services. We have prepared this privacy policy (“Privacy Policy”) to provide you with information about how we collect, use, disclose, and protect your personal information. Please read this Privacy Policy carefully before using our website or any other websites or mobile applications associated with Snap (collectively, our “Sites”). By using our Sites or any of the products and services available on our Sites, you accept this Privacy Policy. Additionally, as a financial institution, the types, and categories of personal information we may collect from or about you as a consumer and our uses and disclosures of any such information are also controlled by Snap’s Privacy Notice located under Privacy Notices below.

We may amend this Privacy Policy at any time. We will attempt to provide you with reasonable notice of any changes; however, unless otherwise stated, the updated version will go into effect as soon as it is posted to our Sites. Please check back each time you use our Sites for the most current Privacy Policy. In the event of any inconsistency between this Privacy Policy and any other agreements that you may enter into with Snap for specific products or services, the terms of the specific agreement shall control.

## **How Snap collects your information**

### **Information Snap collects about you**

Snap collects information about you (“Personal Information”) and your use of our Sites, some of which may be sensitive Personal Information (“Sensitive Personal Information”) and some of which may not be personally identifiable (“De-identified Information”). We collect Personal Information, Sensitive Personal Information, and De-identified Information about customers and Site visitors, in primarily these ways: directly from a customer or Site visitor; from or about customers and applicants applying for or using financial products offered by Snap or third parties to which we provide services; from our web server & application logs, cookies, web beacons, and similar technologies; from our apps; and from third-parties.

We define Personal Information as information that directly identifies an individual, such as name, residential street address or postal address, email address, and date of birth.

Sensitive Personal Information is Personal Information that includes a Social Security number, driver’s license number, government issued identification number, credit card number, bank account or other financial institution account number, or user name and password.

We define De-identified Information as information about an individual or about categories or groups of individuals that does not identify you individually, such as randomly assigned values in “cookies” and other technical information. We also collect other information that may not identify you individually, such as occupation and other employment information, source of income, and other information.

## **Information Snap learns from your use of our Sites**

When you visit our Sites, we may collect information sent to us by your computer, mobile phone, or any other device. This information may include your IP address, device information including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as your browser type, traffic to and from our Sites, the pages you accessed on our Sites, and any other available information. We may also collect information about your use and interaction with our Sites. For example, we may evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of our Sites. When you use our Sites, we may also store information based on your usage history. This includes, but is not limited to, details of your purchases, content you viewed, event information, click stream information, and cookies that may uniquely identify your browser or your account. We may also collect information about you from any contact you have with any of our services or employees, such as, with our customer support team, in surveys, or through interactions with our affiliates.

## **Cookies and other tracking technologies**

We or our third-party service providers may place and read data stored (via session and/or persistent “cookies” or other device specific storage capabilities) on the device you are using, and use other technologies such as Web beacons, clear GIFs, tracking pixels and tags, when you visit or use our Sites or open a Snap email. Cookies are small data files that are placed on your device for a variety of purposes, including to identify your device and/or your account when you return to Snap Sites.

You can generally remove, block, or disable cookies by using the settings located in your browser. If you decide to remove or not accept cookies, some features and services on our Sites may not work properly and the offers we provide when you visit or use our Sites may not be as relevant to you or tailored to your interests.

## **Information obtained from third parties**

We may also obtain information about you from third parties such as credit reporting agencies and identity verification services. You may choose to provide us with access to certain Personal Information stored by third parties such as social media sites (such as Facebook and Twitter). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization. By associating an account managed by a third party with your Snap account and authorizing Snap to have access to this information, you agree that Snap may collect, store, and use this information in accordance with this Privacy Policy.

## **Third-party links**

Snap may contain links to third-party websites, including social media sites. By including a link to a third-party website, we do not endorse or recommend any products or services offered or information contained at the third-party website. Any access to and use of such linked websites is

not governed by this Privacy Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites. If you decide to visit a third-party website via a link contained in or by Snap Sites, you do so at your risk.

## **Rakuten**

We partner with Rakuten Advertising, who may collect personal information when you interact with our Sites. The collection and use of this information is subject to the privacy policy located here: [Rakuten's privacy policy](#).

## **How Snap protects your information**

Snap stores and processes your information maintaining physical, electronic, and procedural safeguards. We maintain physical security measures to guard against unauthorized access to systems and use safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings, and we authorize access to personal information only for those employees or contractors who require it to fulfill the responsibilities of their jobs.

## **How Snap uses your information**

### **To provide our services and products**

We use your Personal Information, Sensitive Personal Information, and De-identified Information primarily to review your lease, loan, or installment contract application and provide you the ability to lease and/or purchase products, to ensure quality of service, for servicing and collections purposes, to contact you, to provide you with offers or information about products and services, and to provide you with a personalized website experience.

### **To improve our service**

We intend to provide you with a personalized experience. We do not alter or change your experience, or otherwise respond to “DNT” or “do not track” signals or other mechanisms received from your computer or mobile device.

We and third parties, including our service providers, may use information from our server logs, cookies and other technologies, in combination with information you provide, transaction information, and information that we or they collect from others, to develop, offer, deliver, and improve our products and services; to offer products and services of our affiliates, marketing partners, and other companies; to process your transactions; to fulfill legal and regulatory requirements; and as otherwise permitted by applicable law. For example, we may use these tracking technologies for our business purposes, such as:

**Site operations:** Enabling features that are necessary for providing you the services on our Sites, such as identifying you as being signed in, tracking content views, remembering your preferences, and the number of times you have been shown an advertisement.

We have engaged TrackJS to improve site error reporting. TrackJS's standard use of cookies and other tracking technologies can enable it to have access to Personal Information of visitors to our sites. Such access to and use of Personal Information by TrackJS is governed by TrackJS's [Privacy Policy](#). By default, we do not allow TrackJS to record any Personal Information inputted into any of our forms.

We have engaged Sentry to improve site error reporting, measure site performance and understanding how our customers are engaging with our Sites. Sentry's standard use of cookies and other tracking technologies can enable it to have access to Personal Information of visitors to our Sites. Such access to and use of Personal Information by Sentry is governed by Sentry's [Privacy Policy](#). By default, we do not allow Sentry to record any Personal Information inputted into any of our forms.

**Analytics:** Allowing us to understand how our Sites are being used, track site performance, and make improvements.

**Personalized advertising:** Delivering tailored advertising based on your preferences or interests across services and devices and measuring the effectiveness of advertisements.

We have engaged Hotjar to analyze the user behavior of visitors to our Sites and provide research information designed to improve the customer experience. Hotjar's standard use of cookies and other tracking technologies can enable it to have access to Personal Information of visitors to our Sites. Such access to and use of Personal Information by Hotjar is governed by Hotjar's [Privacy Policy](#). By default, we do not allow Hotjar to record any Personal Information inputted into any of our forms. Your inputted private details will not form part of Hotjar's research. If you wish to opt out of Hotjarresearch, you can do so here: [Hotjar - Do Not Track](#).

We also use Google Analytics to generate statistical and other information about the use of our Sites by means of cookies. To learn more about Google's privacy policy, please visit:

<http://www.google.com/policies/privacy/>.

You can also learn more about how to opt out of the collection and processing of such information by Google by visiting this [website](#). We also use Google Tag Manager, which assists to manage information about the use of our Sites, but this functionality does not capture any user-specific identifiers that could be associated with a particular individual. We also use the Google Maps API on the Sites.

We also use Amplitude to generate statistical and other information about the use of our Sites by means of cookies. To learn more about Amplitude's privacy policy please visit this link.

We, or our third-party vendors, may collect Personal Information about your online activities over time and across different websites when you use our Sites.

## **To serve relevant marketing to you**

We may use information to deliver targeted marketing, service update notices, and promotional offers based on your communication preferences. We may combine your information with information we collect from other companies and use it to improve and personalize our Sites, content, and advertising.

We may contract with third parties to advertise our products and services on Sites not affiliated with Snap. If you click on one of our advertisements, you link to the Snap Sites that offer the advertised product or service. These ads may contain cookies that allow tracking of your response to our ads. We and our contracted third parties track and report performance of our advertising and marketing campaigns by using cookies and use related technology, such as tracking pixels. These tracking pixels (also known as action tags, Web beacons, or transparent GIF files) and other similar tracking technologies may be used to collect and store information about user visits, such as the user's anonymous cookie ID, page visits and duration, and the specific ad or link that the user clicked on to visit the Site. No Personal Information is stored on these cookies or tracking pixels.

You can learn more about ad-serving companies and the options available to limit their collection and use of your information by visiting the websites for the Network Advertising Initiative (<https://optout.networkadvertising.org>), the Digital Advertising Alliance (<https://optout.aboutads.info>), and the European Interactive Digital Advertising Initiative (<https://edaa.eu/>). Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting out of advertising networks services does not mean that you will not receive advertising while using our Sites or on other websites, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. Note that if you delete your cookies, you may also delete your opt-out preferences.

## **How Snap discloses your information**

### **For our everyday business purposes**

We disclose your Personal Information with employees, affiliates, vendors, partners, merchant partners, finance partners, marketing providers, and third parties as required to offer Snap

products or services. This includes, but is not limited to, processing transactions, maintaining your account, responding to court orders and legal investigations, litigation purposes, complying with audits or other investigations, and reporting to credit reporting agencies. We also engage the following types of service providers to perform functions on our behalf: marketing providers, billing and collection providers, auditing and accounting firms, professional services consultants, providers of analytics services, security vendors, and IT vendors. Occasionally, these service providers may also collect data directly from you and their privacy policies may also apply.

We may disclose your information with the merchants from which we acquire goods to lease to you, or from which you purchase goods or services or products, for marketing purposes, and as otherwise permitted by law.

We may disclose your information to banks and other financial partners with whom we have partnered to offer financial products, for marketing purposes, and as otherwise permitted by law.

## **When required by law**

We will disclose your information with any party when required by law or by a government request to do so or to combat fraud or criminal activity.

## **With our merchant partners or financing partners to provide personalized offers**

We may disclose your information with merchants or financing partners you interact with using Snap for marketing as permitted by law. We do this to help personalize services and offers, so you can have a better experience or so that you can evaluate additional financial products. You're able to revoke your consent at any time by following the steps below. If you choose to do so, we will stop disclosing your information with merchants or financing partners from that point onward, except as necessary to complete transactions you initiate. To revoke your consent to information disclosures with merchants for marketing, please call us at (888) 626-1226.

## **What are your options?**

### **Notifications**

If you no longer wish to receive notifications about our or others' products or services, or receive special offers, via email, you may change your notification preferences using the unsubscribe link included in any of the emails you receive from us or them. Alternatively, please call us at (888) 626-1226. If you elect not to receive email notifications about our or others' products or services, or special offers, you will not be eligible for such offers, and Snap reserves the right to limit future offers or access to certain products or services should you opt out of the crucial notices that are required to perform the Snap services. You are still responsible for any amounts due to Snap even if we close or limit access to your account.

## **SMS messaging**

You can opt out of receiving SMS messages by responding with “STOP” to any SMS message we have provided to you. Our SMS terms are here: <https://snapfinance.com/legal/sms-terms-and-conditions>.

## **California consumers**

### **Your California privacy rights**

Persons with disabilities may obtain this notice in alternative format upon request by contacting a Customer Service Representative at (888) 626-1226.

**California Consumer Privacy Act:** The California Consumer Privacy Act (“CCPA”) provides California residents with the right to receive certain disclosures regarding the collection, use, and disclosure of “Personal Information,” as well as the right to know/access, delete, correct, opt out of selling or sharing of Personal Information, and limit the use and disclosure of Sensitive Personal Information. The CCPA defines “Personal Information” to mean “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” Certain information we collect, use, or disclose may be exempt from the CCPA because it is considered public information (e.g., it is made available by a government entity) or covered by a specific federal privacy law, such as the Gramm–Leach–Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

To the extent that we collect Personal Information, including Sensitive Personal Information, that is subject to the CCPA, that information, our practices, and your rights are described below.

### **Right to notice at collection regarding the categories of Personal Information collected**

You have the [right to receive notice](#) of the categories of Personal Information and Sensitive Personal Information we collect, and the purposes for which those categories of Personal Information and Sensitive Personal Information will be used. This notice will be provided at or before the time of collection. The categories we use to describe the information are those enumerated in the CCPA.

### **Personal identifiers**

- We collect your name, phone number, email address, and contact address when you submit an application or complete a transaction. If you choose to create an account, you will also be asked to create a username and password. We use this information to provide our services, respond to your requests, and send information and advertisements to you.
- We collect your IP address automatically when you use our Sites. We use this information to identify you, gauge online activity on our Sites, measure the effectiveness

of online services, applications, and tools, and to serve targeted advertisements based on your online activities.

- We collect your device ID automatically when you use our Sites and may collect your device ID when you submit an application. We use this information to monitor your use, and the effectiveness of, our Sites, to identify you, and to provide you with targeted information and offers.

### **Sensitive Personal Information**

- We may collect your Social Security number or driver's license number. We use this information to identify you, authenticate and collate information about you, prevent fraud, and conduct background checks or other screening activities.
- We collect payment information when you provide it to us, which may be your credit card number and bank account information, when you submit an application or complete a transaction. We use this information in our decisioning and to streamline and facilitate payments and transactions.
- When you use our Sites for the first time, we may ask for your permission to collect your precise location (i.e., your GPS coordinates). If you allow your device to provide us with this information, we use it to make improvements to our products and services, and to provide recommendations and deliver relevant advertising.

### **Protected classifications**

- We collect your age in order to comply with laws that restrict collection and disclosure of Personal Information belonging to minors and in order to verify that you are eligible to engage in transactions with us.

### **Commercial information**

- When you engage in transactions with us, we create records of goods or services leased, financed, purchased, used, or considered, and associated pricing information, as well as leasing, purchasing use or consuming histories or tendencies. We use this information to comply with law, to measure the effectiveness of our Sites and to provide you with targeted information, advertisements, and offers.

### **Internet or other electronic network activity information**

- We collect information about your browsing history, search history, interaction with websites, and applications or advertisements automatically when you utilize our Sites. We use this information to gauge online activity on our Sites, measure the effectiveness of online services, applications, and tools, and to serve targeted advertisements based on your online activities.

### **Geolocation data**

- As described above, we collect your IP address automatically when you use our Sites. We may be able to determine your general location based on your device's IP address. If you allow your device to provide us with this information, we use it to make improvements to our products and services, and to provide recommendations and deliver relevant advertising.



### **Audio, electronic, visual, or similar information**

- If you contact us via phone, we may record the call. In certain circumstances, we may notify you if the call is being recorded at the beginning of the call. We may collect your photographic or video image, or similar information. We use this information to monitor our customer service, maintain the security of our systems and physical locations, and train employees.

### **Professional or employment-related information**

- We collect information about your current employer and your employment history. We use this information to conduct background and other screening activities, and to promote our services to others.

### **Inferences drawn to create a profile about a consumer reflecting the consumer's preferences or characteristics**

- We may analyze your actual or likely preferences through a series of computer processes. On some occasions, we may add our observations to your internal profile. We use this information to gauge and develop our marketing activities, measure the appeal and effectiveness of our Sites, applications, and tools, and to provide you with targeted information, advertisements, and offers.

We may use any of the categories of information listed above for other business or operational purposes compatible with the context in which the Personal Information was collected. These business purposes include:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business;
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing or leasing services, providing advertising or marketing services, providing analytic services, engaging in collection activities or providing similar services;
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the

business with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers;

- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us;
- Any commercial purposes, including any purpose to advance your commercial or economic interests, such as by inducing you to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction; or
- Conducting any other legitimate business activities not otherwise prohibited by law.

We may disclose any of the above-listed information with service providers, which are companies that we engage for business purposes to conduct activities on our behalf. Service providers are restricted from using Personal Information for any purpose that is not related to our engagement. The categories of service providers with whom we disclose information and the services they provide are described in this Privacy Policy.

The categories of sources from which we collect Personal Information are described above under the sections entitled “Information Snap collects about you”, “Information Snap learns from your use”, and “Cookies and other tracking technologies”.

## **Right to know about personal information disclosed for a business purpose**

You have the right to know the categories of Personal Information we have disclosed about you for a business purpose in the preceding 12 months which may include: name, address, telephone number, email address, social security number, and bank account or other financial institution account number.

## **Right to know/access information**

You have the right to request access to Personal Information collected about you during the past 12 months and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. To protect our customers’ Personal Information, we are required to verify your identity before we can act on your request.

## **Right to request deletion of information**

You have the right to request in certain circumstances that we delete any Personal Information that we have collected directly from you. To protect our customers’ Personal Information, we are required to verify your identity before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

## **Right to information regarding financial incentives**

We may run promotions from time to time wherein we incentivize a consumer to disclose certain pieces of information with us. Participation in these incentives is voluntary, and you may opt out of the financial incentive programs at any time.

## **Right to opt out of sale or sharing of personal information to third parties**

We do not sell Personal Information, and we will not sell Personal Information except as described in this Privacy Policy or if we provide you with notice and a right to opt-out of such sale. We do not engage in cross-context behavioral advertising.

We do not sell the Personal Information of California consumers that are less than 16 years of age, unless the consumer (in the case of consumers between 13 and 16 years of age) or the consumer's parent or guardian (in the case of consumers who are less than 13 years of age) has affirmatively authorized the sale of the consumer's Personal Information.

## **Right to correct inaccurate personal information**

You have the right to correct any inaccurate Personal Information that we maintain about you. To protect our customers' Personal Information, we are required to verify your identity before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

## **Right to limit our use and disclosure of sensitive personal information**

We do not use or disclose your Sensitive Personal Information except as necessary to perform the services described in this Privacy Policy.

Please note that your right to opt out does not apply to our disclosure of Personal Information with service providers, who are parties we engage to perform a function on our behalf and are contractually obligated to use the Personal Information only for that function.

We may also disclose information to other entities when required by law or to protect Snap or other persons, as described in our Privacy Policy.

## **How to submit a request**

You may submit a request to exercise your rights through the following means:

- By visiting <https://snapfinance.com/ccpa-request-form> and completing a request form; or

- By calling us at (888) 626-1226.

## **Verification procedures**

In order to process your CCPA requests, we must verify your request. We do this by:

- Asking you to provide personal identifiers we can match against information we may have collected from you previously, and
- Asking you to confirm your request using the email address or telephone account stated in the request.

If you have authorized someone else to make requests on your behalf, we will require that you provide statements confirming the identity and authority of that person.

## **Authorized agent**

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We require that you and the individual complete notarized affidavits in order to verify the identity of the authorized agent and confirm that you have authorized them to act on your behalf.

## **Retention of your information**

We retain the Personal Information and Sensitive Personal Information we collect as described in this Privacy Policy for as long as you use our services or as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve dispute, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **No Discrimination or Retaliation**

You have the right to be free from discrimination or retaliation based on your exercise of your CCPA rights.

## **Contact Snap**

If you have questions or concerns regarding this Privacy Policy, you can write or call us toll-free at:

Snap Finance LLC  
PO Box 26561  
Salt Lake City, UT 84126  
(888) 626-1226