

<b>FACTS</b>	<b>What does Seen Finance Inc. do with your personal information?</b>
<b>Why?</b>	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.
<b>What?</b>	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 and Income</li> <li>▪ Credit history and credit scores</li> <li>▪ Credit cards and other debt</li> <li>▪ Checking account information</li> </ul>
<b>How?</b>	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 reasons Seen chooses to share; and whether you can limit this sharing.

<b>Reasons we can share your personal information</b>	<b>Does Seen share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes —</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations; or report to credit bureaus	Yes	No
<b>For our marketing purposes —</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes —</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes —</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To Limit Our Sharing</b>	<p>Email <a href="mailto:help@seen.com">help@seen.com</a>. Please include your name, address and last four digits of your account number.</p> <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing. Email <a href="mailto:help@seen.com">help@seen.com</a>. Please include your name, address and last four digits of your account number.</p>
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<b>Questions?</b>	Email <a href="mailto:help@seen.com">help@seen.com</a> . Please include your name, address and last four digits of your account number.
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What we do	
<b>How does Seen protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Seen collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ apply for financing and provide account information</li> <li>▪ give us your contact information and income information</li> <li>▪ use your credit or debit card.</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</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>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include Snap Finance Holdings, LLC, Snap U.S. Holdings, LLC, Snap Finance LLC, Snap RTO LLC, Snap Second Look LLC, Snap Direct LLC and Snap Springboard LLC.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Nonaffiliates we share with may include payment processors, bank partners, collection agencies, providers of application, marketplace or waterfall services, small lenders, and direct marketers.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Our joint marketing partners may include retailers, banks with whom we or our affiliates have a joint program or servicing relationship and their affiliates and service providers companies.</i></li> </ul>
Who we are	
<b>Who is providing this notice?</b>	Seen Finance Inc.

**California Residents:** Accounts with a California mailing address are automatically treated as if they have limited sharing with nonaffiliates as described above on page 1.

**Vermont Residents:** We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, or credit report to nonaffiliated third parties to market to you, other than as permitted or required by Vermont law, unless you authorize us to make those disclosures. Additional information concerning our privacy policies can be found at [www.Seen.com](http://www.Seen.com), or call 833-723-9336.

**North Dakota Residents:** We will not disclose our records about you, or information derived from those records, to nonaffiliated third parties (other than as permitted or required by law), unless you authorize us to make those disclosures. Your authorization must be in writing or, if you agree, in electronic form. If you wish to authorize only some disclosures to nonaffiliated third parties you may tell us: (1) the time during which authorization, (2) the information that we may disclose, and (3) the persons, businesses, and government agencies to which the disclosure may be made. You may revoke your authorization at any time by calling the toll-free number: 877-557-3769.

**Nevada Residents** – You may call **1-833-723-9336** to be placed on our Do Not Call List. For more information, email [help@seen.com](mailto:help@seen.com), or visit [www.seen.com](http://www.seen.com). You may also contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Avenue, Suite 3900, Las Vegas, NV 89101, call **702-486-3132**, or e-mail [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us). This notice is provided pursuant to state law.

## Seen Online Privacy Statement

This Online Privacy Statement describes how Seen Finance Inc. (“our”, “us” or “we”) treat your information on Seen.com and the other websites on which this Online Privacy Statement appears (“Website”), within the Seen Finance mobile apps (“Mobile Apps”) (together with Website, “Online Services”), as well as when you interact with us on social media sites and apps, through e-mails or advertisements displayed through online services operated by us or nonaffiliated third parties.

By using our Online Services or interacting with us online, you agree and consent to the terms and conditions of this Online Privacy Statement. For more information about privacy as it applies to your financial account, please see the Consumer Privacy Statement for the Seen Finance product(s) you have.

## About the Information We Collect

Our Online Services collect information that identifies you, as well as online data about you. The types of information we collect may depend on which product or service you use.

**Our Online Services collect Personal Information.** We often collect your name, account number, User ID, and e-mail address; and we may collect other Personal Information when you use our Online Services. For example, our Online Services may ask for third-party bank account information to complete a funds transfer or our Mobile Apps may also ask for images of checks you wish to deposit.

Our Online Services collect online data. We may collect information about the browser, IP address, device (including device ID and advertising ID), and operating system you are using. We may look at what website you came from, what you view within our Online Services, and/or what website you visit when you leave us. We may collect your location using a cellular network location, Wi-Fi networks, browser services, mobile location services if turned on, or other information you provide.

**Our Online Services collect information in different ways.** Information is collected directly from you. We may collect your name, account number, User ID, e-mail address, or other Personal Information you submit to us when you use our Online Services. We also collect other information you submit through our Online Services, such as requests to enroll in offers and alerts, and what you write when you complete an online survey. We will collect information when you click a link. If you engage with our interactive chat functionality, we may record the conversation and the information you provide. Please note that this chat functionality may be an automated program and not a real person, and the information relating to your communications may be shared with our service provider.

**Information is collected passively.** Our Online Services and some e-mails may use tracking tools like cookies and pixel tags. Our Online Services gather online data about you over time across multiple websites, other platforms, or other Mobile Apps. The information collected by our Online Services may be combined with other data that we obtain about you, including data from third parties and offline sources. Additionally, we implement session replay technology that we use to better understand interactions with our Online Services users. This session replay technology collects information about your interactions with our pages, including the duration of your visits to each page, the content you may have reviewed, the location of your clicks, and the way you navigate our Online Services.

We collect information about you from third parties, including social media sites and apps. Our Business Partners and Service Providers may give us information about you. Additionally, we collect information about you from third parties, including social media sites and apps, and when you interact with the Seen Finance brand on social media sites and apps or other third-party websites, including but not limited to Facebook, Twitter, Pinterest, LinkedIn, Instagram and YouTube. Your use of such sites or apps and what information each social media site or app may share with us is subject to their privacy policies, terms of use, and privacy and advertising settings. Note: never disclose any personal financial information on any social media site or app.

## How We Use Information We Collect

Information collected from and about you online as described in this Statement may be used for different purposes.

**We use information to respond to your requests or questions.** For example, we may use your information to process an application or complete a transaction that you requested. We may also use your information to send you an alert you signed up for.

**We use information we collect to improve our products and services.** We use information to make our Online Services better and to customize your experience with us. We may combine information we get from you with information about you we get from third parties and other offline sources. We may use technology that allows us to recreate a browser session to resolve customer concerns or improve our Online Services. We may use information that we get online to help us manage your account. Please see the Consumer Privacy Statement for the product(s) you have to learn more.

**We use information for security purposes.** We may use information, including your location information and IP address, to protect our company, our customers, and our Online Services from fraud, unauthorized transactions, claims and liabilities, and to manage risk. For example, if you have location services turned on while you are using the Mobile Apps, we may use that data to help identify potential fraudulent transactions.

**We use information to communicate with you about your account or our relationship.** We may contact you about your account or feedback. We may also contact you about this Online Privacy Statement or our Terms of Use. We may communicate with you about your account and the services we provide to you. We may use the contact information you provide to do this. It is your responsibility to keep your contact information current with us.

**We use information for marketing purposes.** We may use information we know about you from our Online Services, including your location information, to send you information about new products and special offers. These may come from us, our Business Partners, our Service Providers or third parties. We may tell you about new features or updates we think you will like. We may also use push notifications on our Mobile Apps.

When you visit our Websites or open up our Mobile Apps, we may use information that allows us (or our Business Partners, Service Providers or third parties on our behalf) to send your computer or device targeted messages and offers. We may use passive technologies such as cookies, location information, device-level advertising and user identifiers, and pixel tags to uniquely identify your computer or device and the pages you view within our Online Services as well as to provide information to us and third parties about sites and apps you visit after seeing Seen Finance ads or offers.

We use information as otherwise permitted by law and to comply with the law.

## What We Share

We may share the information we collect from and about you as described in this Statement with the following groups.

We share this information among the Seen Finance family of companies, including current and future Seen Finance subsidiaries or affiliates, and with our Service Providers. For example, we may share information such as your phone number or e-mail address with Service Providers who send texts or e-mails on our behalf; information regarding your use of our interactive chat functionality, including the contents of your communications, with our Service Providers who enable us to provide this service; information with companies that operate or analyze our Online Services; information with third parties who perform advertising services on our behalf;

**We share this information with our Business Partners.** We may share information with our Business Partners to fulfill offers you request or to use your rewards toward a purchase; information to a social media site or app if you click on a social media widget within our Online Services (for example, if you "like" us from our Website).

**We share this information if we are required to comply with the law or to protect ourselves.** We may share information to respond to a court order or subpoena. We may share it in response to a government agency or investigatory body request. We may share information when we are investigating potential fraud.

**We may share this information with any successor to all or part of our business.** If all or part of our business is sold we may be required to give our customer information as part of that transaction. We may share this information with third parties at your request or with your authorization. We may share this information for other reasons we may describe to you. Please see the Consumer Privacy Statement for the product(s) you have to learn more.

## Managing Your Online Privacy Choices

You can update your account profile online or by phone. If you have online access to your account, you can view and update your account profile, including your contact information, by logging in to your Seen Finance account and updating your profile page. You can also call us to make changes to your account profile or marketing preferences. To stop receiving our promotional e-mails or texts, you can follow the instructions in promotional messages you receive from Seen Finance. Even if you opt out of getting marketing messages, we may still send you transactional messages, including responses to your questions or information about your account.

You can control preferences on your mobile devices. For example, you can turn off location services within your mobile device settings or Mobile Apps, decline to consent to location tracking when prompted by the Mobile Apps, or reject receiving push notifications on your device. If your operating system allows, you may choose to limit the Mobile Apps' access to other information on your mobile device, including but not limited to the camera, contacts, or calendar. This may result in the loss of some of the Mobile App functionality.

## About Our Ads, Tracking and Your Choices

**We conduct interest-based advertising.** You may see Seen Finance advertisements on other websites you visit from time to time. Some of these ads are based on your internet browsing history over time and across different websites or platforms, including Seen.com. We collect information through internet tracking and browsing history, and have Service Providers and third parties collect information this way. This is called interest-based or online behavioral advertising. Seen Finance uses interest-based advertising to target its advertising more effectively. Interest-based advertising includes ads served to you after you leave our Website, encouraging you to return and ads we think are relevant based on your shopping habits or online activities. These ads may be about our products or other companies' products and served by us or third parties via websites, apps or in e-mails or direct mail.

**How you can opt out of interest-based advertising.** You can opt out of interest-based advertising right from the ad itself. Ads served using interest-based advertising will have an Advertising Option icon in the ad. If you see that icon on

Seen Finance ads, you can click on it. You will then get an option to opt out. On mobile devices, you can control device-level advertising privacy settings.

**We use common tracking technologies for a variety of reasons.**

We use tracking tools:

- To recognize new or past customers;
- To store your password if you are registered on our Website or Mobile Apps;
- To improve our Website and Mobile Apps;
- To serve you with interest-based or targeted advertising
- To observe your behaviors and browsing activities over time across multiple websites or other platforms; and
- To better understand the interests of our customers and our Website and Mobile Apps visitors.

**How do we gather relevant information about you for interest-based advertising?** To decide what is relevant to you, we use information you make available to us when you interact with us, our affiliates, and other third parties. We gather this information using the tracking tools described above. For example, we or our Service Providers or Business Partners may look at your purchases or browsing behaviors. We may look at these activities on our platforms or the platforms of others.

**We work with third parties who help gather this information.** These third parties may link your name or e-mail address, for example, to other information they collect. That may include past purchases made offline or online. Or, it may include online usage information.

**You can control tracking tools on our Online Services.** Industry standards continue to evolve around browser-level "do not track" settings. Your browser may give you the ability to control tracking tools like cookies and pixel tags. You may enable a tool at the browser or device level that automatically communicates your opt-out preferences, such as Global Privacy Control ("GPC"). We will process the GPC signal as a request to opt-out for the browser or device you are using at that time. Certain browsers can be set to clear past and reject future tracking tools. If you block tracking tools on your browser, certain features of our Online Services may not work. Additionally, if you block or delete tracking tools, not all of the tracking activities we have described here will stop. Choices you make are both browser and device-specific.

**We also advertise in other ways.** If you opt out of interest-based ads, you may still see Seen Finance ads. These are ads that are not based on your Internet browsing history and may be generic while others may be targeted to you or an advertising segment you are in. The websites or services where targeted ads appear will have instructions about how to modify your advertising preferences within those sites. We encourage you to review those instructions and settings.

## Additional Information

**How Long We Retain Your Data.** We may keep personal data as long as necessary or relevant for the practices described in this Online Privacy Statement or as otherwise required by law. Actual retention periods vary depending on particular services and products. We use the following to determine retention periods:

- Personal data are needed to provide our services and products as described in this Online Privacy Statement (for example, to provide access to Websites and Mobile Apps);
- Personal data are needed for auditing purposes;
- Personal data are needed to troubleshoot problems or to assist with investigations;



- Personal data are needed to enforce our policies; and
- Personal data are needed to comply with legal requirements.

**Regulations require all financial institutions to obtain, verify, and record information that identifies each person for whom we open or have established an account.** It is the policy of Seen Finance that our records reflect our customer's name, physical address, date of birth, and identification number. With respect to records such as customer applications, account statements, and payments on the account, Seen Finance generally retains those records for a minimum of seven years.

**If you use our Mobile Apps, you may contact us about deleting your account or by deleting your account through the application itself, if applicable.** Please note that deleting the Mobile App will not delete your Seen Finance account, and we will need to maintain such information to service your account. Additionally, as a regulated financial institution, we have certain legal obligations to retain some data for regulatory compliance purposes.

**These Online Services are not intended for children.** Our Online Services are meant for adults and are not directed to children. We do not knowingly collect Personal Information from children under 13 without permission from a parent or legal guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can e-mail us at [help@seen.com](mailto:help@seen.com).

**We use standard security measures on our Online Services.** To protect your Personal Information from unauthorized access, we use security measures that comply with federal law, including computer safeguards and controls. However, the Internet is not 100% secure. We cannot promise that your use of our Online Services will be completely safe. We encourage you to use caution when using the Internet. For example, do not use our Online Services on jailbroken or rooted devices and do not share your passwords.

**Social Security Number and ITIN Protection.** Seen Finance protects your Social Security number and ITIN. Our policies and procedures:

- Protect the confidentiality of Social Security numbers and ITINs;;
- Prohibit the unlawful disclosure of Social Security numbers and ITINs; and
- Limit access to Social Security numbers and ITINs to employees or others with legitimate business purposes.

These protections apply to all Social Security numbers and ITINs collected or retained in any way by Seen Finance in connection with customer, commercial, employee, or all other relationships. Individuals applying for or obtaining a product or service from us to be used primarily for personal, family or household purposes may obtain more information by reviewing the applicable Consumer Privacy Statement.

**Our Online Services may link to third-party services or apps that we do not control.**

If you click on a link to a third-party site or app, you will be taken to websites or apps we do not control, which may include but is not limited to social media sites and apps. This Online Privacy Statement does not apply to the privacy practices of those websites or apps. Carefully read the privacy policy of other websites or apps. We are not responsible for those third-party practices.

We may update this Online Privacy Statement at any time.

This Online Privacy Statement is effective August 31, 2023. We may change our Online Privacy Statement from time to time. We will notify you of any material changes as required by law, such as by posting the revised privacy statement on this page with a new "last updated" date. Please check the Website and Mobile App periodically for updates. This Online Privacy Statement was last updated on August 3, 2023.