

Azlo Online Privacy Policy

Effective date: October 2018

This Privacy Policy applies to your interaction with Azlo (“Azlo,” “we,” “us,” “our”) at any online site that we own and control, including our mobile application, (“Sites”), unless a different online and/or mobile policy is posted at a particular site, or is made available to you and by its terms supersedes this Policy. Other privacy policies may also apply in addition to the terms of this Policy. You may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party’s privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise.

This Policy also addresses the use of your data by our third-party service providers. Specifically, we use Plaid Technologies, Inc. (“Plaid”) to gather your data from financial institutions. By using this service, you consent and grant Azlo the right to request Plaid to transmit your personal and financial information from the relevant financial institution to Azlo and you grant Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution according to the terms of its privacy policy available at <https://plaid.com/legal/#privacy-policy>. Additionally, we use InAuth for certain security functions, and in so doing, we may collect and store certain personally identifiable information about you, including your location and GIS data. Such information will only be used as permitted by law and our privacy policies and practices. Except as set forth in this paragraph, this Policy is not a contract and does not create any legal rights or obligations.

What information do the Sites obtain and how is it used?

Types of Information

You may interact with us in a variety of ways online, including through a PC, tablet, or mobile device. We may offer Sites that permit browsing and do not require registration. We may also offer the ability to access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, e-mail address, other contact information; data resulting from your

activity, such as transaction information; and location information. We may also gather additional information such as the type of device and browser you are using, the Internet protocol (IP) address of your device, information about your device's operating system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below.

Location Information

The Sites may collect information about your location when you choose to use location-based services. For example, the Sites will collect the address, city, and/or zip code that you provide when submitting an online account application or inquiring about local interest rates. The Sites may also access information about the location of your device automatically when needed to perform location-based services that you request. Location information may be obtained based on your device's IP address and through other technologies, like GPS. We use your location information to provide requested location-based services, such as finding ATMs nearest to you and displaying them on a map in relation to your location.

Depending on the type of device and browser you are using, you may be able to prevent access to certain location information in your device and/or browser settings; however, doing so may limit the functionality we can provide when you visit our Sites. We recommend that you refer to information supplied by your device and browser providers for specific information about how to use location settings.

About "Cookies"

In order to provide better service, our Sites may use a software "cookie." A cookie is a small piece of information which a web site stores in the web browser of your device and can later retrieve. A cookie cannot be read by a web site other than the one that set the cookie. Many cookies only last through a single session or visit.

We may use cookies for a number of administrative purposes; for example, to store your preferences for certain kinds of information. We may also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our Sites; monitoring online promotions; and anti-fraud and information security purposes.

- **Cookies used to facilitate online transactions.** These types of cookies are called session cookies and may be necessary in order to access certain services within our Sites. These cookies may also prevent you from having to

enter information twice. These cookies are not active after you log off of the services and are deleted when you completely close your web browser windows after a session. When you use our Sites, we also may use the information in the cookie or similar file to match the web browser and device you use with your account for security purposes.

- **Cookies used for personalizing your visit.** We may create some cookies that allow us to present information that is useful to you when you later return to our Sites. These cookies remember your preferences from an earlier visit in order to customize our Sites pages when you return. These cookies stay on your device unless you delete them.
- **Cookies used to evaluate our Sites.** We may use these cookies to track how visitors use our Sites, including the pathways to certain pages, the time spent on a page, and the number of visitors to a page. This allows us to improve navigability of our Sites and to decide to delete or improve pages. These cookies stay on your device unless you delete them.
- **Cookies used to evaluate the effectiveness of advertising placed elsewhere on the Internet.** We may use these types of cookies and other related technology to track responses to our online advertisements and the ranking of our internet address in search engines. These cookies are placed on your device when you view our ad at another web site or on our own Sites. These cookies identify the ads which led to your visit to our Sites. These cookies stay on your device unless you delete them. We may use third-party advertising companies to serve ads and/or collect information when you visit our Sites and sites upon which we advertise. This third-party advertising technology uses information about your visits to our Sites and the sites upon which we advertise to serve our ads to you. In the course of serving our advertisements to you, a unique third-party cookie may be placed or recognized on your browser. In addition, we may use web beacons, provided by third-party advertising companies, to help manage our online advertising. These web beacons enable us to recognize a browser's cookie when a browser visits these Sites and to learn which banner ads bring users to our Sites. To learn more about our third-party advertising companies and cookies, please contact support@azlo.com.

Data collected from a particular browser or device may be used to provide online advertising on another computer or device that is associated with the browser or device on which such data was collected. We do not store any information on cookies that would enable anyone to contact you via telephone, e-mail, or U.S. mail.

We may also provide certain widgets or tools on our Sites, such as tools that allow you to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our Sites, such as a map or information streaming from another site, including communications streaming from a third-party social media platform. These widgets, tools, and informational items often function through the use of third-party cookies utilized by the third-party site, such as the social media platform. You may wish to review information at third-party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

Do You Have to Accept Cookies?

You may be able to set your browser to reject cookies. However, if you choose to reject cookies, you may limit the functionality we can provide when you visit our Sites. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by your browser provider for specific information about how to use these tools.

Do Not Track

Do Not Track ("DNT") is a privacy preference that users can set in recent versions of most major web browsers, including Firefox 5+, Internet Explorer 9+, Safari 5.1+, and Chrome. DNT allows users to inform web services that they do not want certain information about their webpage visits collected across web sites.

Whether you have turned on DNT or not, our Sites does not collect personally identifiable information (PII) about your online activities over time and across third-party web sites or online services. Nor do third parties use our Sites to collect PII about your online activities over time and across third-party web sites. For these reasons, our Sites do not respond to DNT signals.

Additional Cookies

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe® folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash® objects. If you choose those options, you may limit the functionality we can provide when you visit our Sites.

Additional Technologies

We may also use additional technologies such as ad tags, web beacons, tagged URLs, scripts, and clear GIFs, and may permit our third-party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third-party sites.

Using Information

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Sites, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking web site usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our Sites.

Sharing Information

We may share information with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this Policy; such as data processors and companies that help us market products and services to you and evaluate online advertising and the use of our Sites. When permitted or required by law, we may share information with additional third parties for other purposes, including response to legal process.

Retaining Information

We will retain your information as long as reasonably necessary to provide you with services or to comply with applicable law. This means that even after your account is deactivated, we will retain information about you, your account, your transactions, or anything else in which you may have participated as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request; to detect or prevent fraud; to collect fees owed; to resolve disputes; to address problems with our Sites or services; to assist with investigations; to enforce our terms or other applicable agreements or policies; or to take any other actions consistent with applicable law.

Off-Site Links

For your reference and convenience, our Sites may provide links to other web sites on the Internet. Unless otherwise noted, these links are provided for your convenience and do not constitute an endorsement. These third-party sites are not within our control and may not have the same privacy, security or accessibility standards. Third parties are solely responsible for the content and availability of their sites. You should also refer to the third-party site's privacy and security policies when accessing that site. Additionally, from time to time, we may make available to you and you may agree to purchase services in connection with your account that are provided by a third party. You acknowledge and agree that the terms of those services are between you and the third party. We expressly disclaim any warranties associated with those services and you agree to hold us harmless from any loss or damage you may incur in connection with those services.

Children

We do not use our Sites to knowingly collect data from or market to children under the age of 13. If a child under 13 has provided us with personal information without parental or guardian consent, the parent or guardian may contact us at support@azlo.com or 1-844-295-6466. We will delete such information from our files within a reasonable time and unsubscribe the child from any promotional contact opportunities.

Security

Protecting the confidentiality of your information is very important to us. We have established appropriate physical, electronic, and procedural safeguards to protect information we collect from or about our users. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Sites and services. These safeguards are regularly reviewed to protect against unauthorized access, disclosure and improper use of your information and to maintain the accuracy and integrity of that information.

Policy Updates and Effective Date

We reserve the right to modify this Policy at any time and without prior notice. If we make updates to this Policy, we will update the Policy with the changes and revise the "Effective Date" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Sites. You may also visit <http://www.Azlo.com/privacy> to view the current copy of this Policy. Your use of the Sites following an update to this Policy means that you accept the updated Policy.

Your Consent

By using our Sites or interacting with an Azlo advertisement or page or account on a third-party site, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

Contact us

If you have any questions regarding privacy while using the Sites, or have questions about our practices, please contact us at support@Azlo.com or 1-844-295-6466.