

## Finfare Privacy Policy

At Finfare, we take your privacy very seriously and encourage you to read this privacy policy carefully as it contains important information on who we are and our information practices, meaning what, how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request. The Privacy Policy applies to Finfare Financial, Inc. and Finfare, Ltd and any of their subsidiaries (collectively "Finfare").

In providing its products and services, Finfare will collect information from its customers as well as visitors to its websites, users of its apps and by other means. In addition, we may obtain and or share information from, or to, our affiliates and unaffiliated third parties.

The collection and use of personal information is subject to various state, federal and international regulations. This policy sets out our obligations, and your rights, under governing regulations.

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## **Personal Information Defined:**

It would be helpful to start by explaining some key terms used in this policy:

Personal information	Any information relating to an identified or identifiable individual.
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
Sensitive Personal Information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and immigration status.

## **Personal Information We Collect About You:**

The information we collect will depend on the nature of your interactions with Finfare. For example, if you become a client of Finfare, we may collect personal information such as date of birth or your address whereas if you only visit our website, we may only collect browsing history. Depending on your interaction with us we may collect and use the following personal information, including sensitive personal 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:

Categories of Personal Information	Specific Types of Personal Information Collected
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Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers) (this information may be collected from Facebook profile).	First name, last name, telephone number, email address, address, city, state, zip code, Internet Protocol address, personal MAC address, Cookies, and account name.
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information (this information may be collected from Facebook profile).	First name, last name, telephone number, email address, billing information, address, city, state, zip code.
Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	Account log-in, account password, account authentication code.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).	Records of products purchased.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement).	Consumer's interaction with Finfare's website.
Geolocation data.	IP address, MAC address.

Audio, electronic, visual, thermal, olfactory, or similar information.	CCTV footage, photographs, and call recordings.
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If you do not provide personal information required to provide services to you, it may delay or prevent us from providing services to you.

### **How Your Personal Information is Collected:**

We collect personal information from the following categories of sources:

- You, directly in person, by telephone, text, or email and/or via our website and apps
- Third parties with your consent (e.g., your bank)
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers
- Publicly accessible sources (e.g., property records)
- Cookies on our website
- Our IT and security systems, including:
  - Door entry systems and reception logs
  - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email, and instant messaging systems –and–
  - Online activity, such as pages or screens viewed

### **How and Why We Use Your Personal Information:**

Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

- To comply with our legal and regulatory obligations
- For the performance of our contract with you or to take steps at your request before entering into a contract

- For our legitimate interests or those of a third party –or–
- Where you have given consent

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide products AND/OR services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Finfare	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator or bank</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price

Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures	<p>For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price</p>
Preventing unauthorized access and modifications to systems	<p>For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	<p>To comply with our legal and regulatory obligations</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>

<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>• Existing and former customers</li> <li>• Third parties who have previously expressed an interest in our services</li> <li>• Third parties with whom we have had no previous dealings</li> </ul>	<p>For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers</p>
<p>Credit reference checks via external credit reference agencies</p>	<p>For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services</p>
<p>External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts</p>	<p>For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligation</p>

## **Who We Share Your Personal Information With:**

We routinely share personal information with:

- Our subsidiaries and affiliates, including companies within Finfare's group
- Service providers we use to help deliver our products and/or services to you, such as payment service providers or processors
- Other third parties we use to help us run our business, such as marketing agencies or website hosts
- Third parties approved by you, including social media sites you choose to link your account to other third-party payment/service providers
- Credit reporting agencies
- Our insurers and brokers
- Our bank
- Fraud prevention and identity service providers

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they only use your personal information to

provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to ISO, SOC2, or Investors in People accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Personal Information We Sold or Shared:**

In the preceding 12 months, we have sold or shared the following categories of personal information:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

### **Categories of Personal Information We Disclosed for a Business Purpose:**

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes –and–
- Sensitive personal information

### **How Long Your Personal Information Will Be Kept:**

We will keep your personal information while you have an account with us or while we are providing products AND/OR services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To show that we treated you fairly
- To keep records required by law

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information as well as

the business purpose the information was collected. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

### **Keeping Your Personal Information Secure:**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used, or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We continually test our systems and hold SOC2 Type II ISO 27001 attestations, which means we follow top industry standards for information security. We also comply with the Data Privacy Framework. And have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **California Consumers:**

Finfare is subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). The CCPA gives consumers residing or consuming products and services in the state of California certain privacy rights to include:

- The right to know about the personal information a business collects and how the business uses, shares or sells the information;
- The right (with certain exceptions) to request the business to delete the personal information;
- The right to opt-out of the sale or sharing of their personal information; and The right to be free from discrimination when exercising their rights under the CCPA.

Additional information about how Finfare complies with the CCPA and what consumers can do to enforce their rights under the CCPA are further explained in this policy.

### **Your Rights Under the CCPA/CPRA.**

You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	You have the right to know, and request disclosure of: <ul style="list-style-type: none"><li>• The categories of personal information we have collected about</li></ul>
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	<p>you, including sensitive personal information</p> <ul style="list-style-type: none"> <li>• The categories of sources from which the personal information is collected</li> <li>• The categories of third parties to whom we disclose personal information, if any –and–</li> <li>• The specific pieces of personal information we have collected about you</li> </ul> <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> <li>• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained</li> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information –or–</li> <li>• Provide the personal information to you more than twice in a 12-month period</li> </ul>
Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared – and–</li> <li>• The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose</li> </ul>

	<p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p>
<p><b>Right to Limit Use of Sensitive Personal Information</b></p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> <li>• Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services</li> <li>• To perform the following services: (1) 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; (2) Short-term, transient use, including, but not limited to, non-personalized 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; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic</li> </ul>

	<p>services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business –and–</p> <ul style="list-style-type: none"> <li>● As authorized by further regulations</li> </ul> <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p>
Right to Deletion	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> <li>● Delete your personal information from our records –and–</li> <li>● Delete your personal information from our records –and–</li> <li>● Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort</li> </ul> <p>Please note that we may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> <li>● Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or</li> </ul>

	<p>otherwise perform a contract between you and us</p> <ul style="list-style-type: none"> <li>● Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes</li> <li>● Debug to identify and repair errors that impair existing intended functionality</li> <li>● Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law</li> <li>● Comply with the California Electronic Communications Privacy Act</li> <li>● Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent</li> <li>● Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us</li> <li>● Comply with an existing legal obligation –or–</li> <li>● Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information</li> </ul>
Right of Correction	If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a

	<p>verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
Protection Against Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you</li> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties</li> <li>• Provide a different level or quality of goods or services to you –or–</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of [goods and/or services] to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>

## CAN-SPAM Act (U.S. Consumers)

The CAN-SPAM Act was passed into law in 2003 and governs the way U.S. businesses can communicate with consumers electronically. Electronic communications include emails and computer initiated text/SMS messages. CAN-SPAM correspondence is typically classified into two categories:

- Commercial/Marketing Communications - Are communications sent by a business to existing or potential consumers for the purpose of promoting a product or service.

- Should we updated to Version 2 for all the legal doc? It is still show as Version 1 even though last update 5/1/2025  
Transactional/Relationship Communications - Are communications sent to consumers regarding matters pertaining to a product or service an existing consumer is receiving and the communication's primary purpose is to facilitate, complete, or confirm a transaction, or otherwise inform the consumer about the product or services requested.

In some circumstances a message may contain both commercial and transactional elements. Under such cases, the message will be classified in accordance with its primary purpose. The primary purpose will be viewed from the perspective of the recipient as to whether the recipient is able to ascertain from the header, subject and placing of the content in the message if the purpose is of a commercial or transactional nature.

When communicating electronically, Finfare will adhere to the CAN-SPAM Act accordingly:

- All electronic communications regardless of classification will contain our physical address.
- The subject line of all email correspondence will relate to the primary purpose of the correspondence
- Any headers used will be accurate and correspond to the primary purpose of the correspondence.
- Correspondence with only a commercial/marketing purpose will be noted as an advertisement
- If an email list is used for commercial purposes, recipients will be offered the ability to opt out of future correspondence via an “unsubscribe”, “Opt-out”, “Manage Preferences” or similar link. For more information on opting out see [How to Opt-Out](#).

Consumers opting out of transactional correspondence may no longer receive crucial information about the product/service. Opting out of transactional information may result in us not being able to provide our products and or service, or result in us terminating our agreement with you. Existing consumers should review Finfare's “Terms and Conditions” before opting out.

### **How to Exercise Your Rights:**

If you would like to exercise any of your rights as described in this Privacy Policy, you may write, call or email. See “[How to Contact Us](#).”

### For California Consumers

Under California Civil Code Section 1798.83 (known as the “Shine the Light” law), our customers who are residents of California and who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing use. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared

customer information for the immediately prior calendar year (e.g., requests made in 2021 will receive information regarding 2020 sharing activities).

When submitting a request for information, please be sure to reference "Request for California Privacy Information." Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

- Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.
- If you choose to contact us directly by [website/email/phone/in writing], you will need to provide us with:
  - Enough information to identify you [(e.g., your full name, address and customer or matter reference number)]
  - Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
  - A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

### **How to opt-out of us selling or sharing your information:**

If you do not want us to share or sell your personal information, please submit a request to the contact information below.

### **How to Contact Us:**

Please contact us by mail, email or telephone if you have any questions about this privacy policy, the information we hold about you, or if you would like this notice in another format (for example: audio, large print, braille).

Our contact details are shown below:

Contact mailing address (U.S.A)	ATTN: Privacy 17900 Von Karman Ave Irvine, CA 92614
Contact email address	<a href="mailto:privacy@finfare.com">privacy@finfare.com</a>

**Policy Version:**

We may change this privacy notice from time to time, When we do, we will inform you via our website or other means of contact such as email. This privacy notice was last updated on May 1, 2025 and published on May 1, 2025.