

Privacy Policy

Effective Date: April 17th, 2020

The privacy and security of your information is very important to Diversified Financial Services, LLC (“DFS”, “we”, “us”, “our”). We are deeply committed to maintaining industry standard levels of security that comply with applicable federal and state laws to help protect the personal information that we collect.

This Privacy Policy applies to your interaction and communication with DFS, including, without limitation, in person, by phone, through mail or email or through any online or mobile site, application or social media account that DFS owns and controls (collectively, “Sites”), unless a separate privacy notice is posted or made available to you and supplements this Privacy Policy.

This Privacy Policy applies only to the Sites and does not extend to other websites, including websites owned and controlled by our partners or third-party websites for which we have provided links, or to any social media platforms, which are governed by their own terms of use and privacy policies.

By accessing or using our Sites or otherwise disclosing information to DFS, you consent to our collection, use, and sharing of your information in accordance with this Privacy Policy.

Information we collect

We collect the below categories of information directly and indirectly from individuals and the parties with which we do business in a variety of ways, including in person, by phone, through mail or email and through our Sites. These may include parties that interact with us directly (our customers or individuals that apply for our products, respond to our surveys, request information about our products or services or otherwise voluntarily provide us with their information), parties to which we provide goods or services, parties that provide goods or services to us and other parties with whom we offer or provide products and services.

We may collect and store the following types of information:

- Identifiers, such as, name, address, email address, phone number, date of birth, social security number, tax payer ID, driver’s license number, passport number, government ID or IP address.
- Protected classification characteristics, such as, race, color, national origin, marital status, sex, veteran or military status.
- Geological data, such as, physical location or movements.
- Biometric information, such as, face prints, voice recordings, fingerprints or keystroke patterns or rhythms.
- Commercial information, such as, organizational information, records of personal property or purchasing history.
- Internet or other similar network usage activity, such as, browser information, search history, device type or service provider information.
- Professional or employment related information, such as, income or current or past job history.
- Educational information, such as, transcript, student records, grades and performance, activities, school name or school ID.
- Health information, such as, medical history, insurance information, benefit plan information, claims history or payment history.

- Inferences drawn from other information, such as, person's preferences, trends or behaviors.
- Personal records, such as, power of attorney, family history or power of attorney.
- Information that you provide by filling in forms or providing other contributions on our Sites, through email or over the phone.
- Information received from a government entity or other third party.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Responses to surveys.
- Details of the transactions you carry out with us or through our Sites, such as transaction records, financial information, credit information, account information and correspondence with you.
- Account information when you register for an account on our Sites.

Further, we and our service providers may use various tracking technologies, including cookies, to collect information about you when you interact with our Sites, including information about your browsing and viewing behavior. Cookies are small data files stored on your hard drive or in device memory that help us improve the Sites and your experience, see which areas and features of the Sites are popular and count visits. In addition, when you access or use the Sites, our servers automatically record certain log file information, such as your Internet Protocol address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Site. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Sites.

Certain information set forth above may be categorized as "personal information" to the extent it identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. Such personal information may receive additional protections under applicable state or federal law. Personal information specifically does not include information that is publicly available information from government records, or information that is deidentified or aggregated information.

We may receive information that third parties provide us, which may include information about you. This Privacy Policy does not apply to information collected through or by any third party. If you have any questions about such third parties' privacy practices, you should review their privacy policies.

How we use information we collect

We may use your information for various purposes related to our operations and your use of the Sites. For example, we may use your information to:

- Detect, investigate or prevent activity that may be illegal, violate our policies, cause harm to our operations or compromise our security.
- Optimize, improve or enhance our products, services and operations.
- Respond to your inquiries or fulfill your requests, including to provide individuals with, or evaluate their eligibility for, products and services that they have requested from us.
- Communicate with individuals about their accounts or transactions that they have made with us.
- Provide information regarding our products or services, including changes to our policies or other terms, conditions or agreements and our Sites.
- Allow participation in surveys, sweepstakes, contests and other promotions.
- Comply with legal and regulatory requirements, required disclosures and choices and controls that may be available.

- Send offers and promotions for our products and services or for other products and services that may be of interest.
- Personalize online or mobile content and user experiences.
- Verify the identity or location of an individual for security, fraud prevention and other risk control purposes.
- Provide advertising based on activity on our Sites.
- Perform operational functions in connection with our business, including data analysis, audits, developing and improving products and services, enhancing the Sites, identifying usage trends and determining the effectiveness of promotional campaigns.
- Offer and in connection with your employment (to the extent applicable to you).
- Maintain appropriate records for internal administrative purposes.
- For any other purpose disclosed by us to you at the time you provide us information.

We may disclose each of the categories of information we collect for any of the business purposes set forth above.

We also may use aggregated or de-identified information, which cannot reasonably be used to identify you. Once de-identified and aggregated so that data does not personally identify you (for example, we may aggregate data in order to improve our automation and improve care), it is no longer personal information. Such de-identified and/or aggregated information which does not identify individuals is not subject to this Privacy Policy.

If you are a California resident, you may have additional rights with respect to your personal information. Please refer to the Section below entitled “California Resident Privacy Rights”.

How we share information we collect

We may share information about you as follows or as otherwise described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business and who need access to such information to carry out work or perform services on our behalf (including equipment dealers).
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.
- To third parties to market their products or services to you.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law or legal process, such as, responding to any government or regulatory request.
- To enforce or apply our terms of use with respect to our Site and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of DFS, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may disclose aggregated information about you, and information that does not identify any individual, without restriction. We may disclose each of the categories of information we collect for any of the business purposes set forth above.

If you are a California resident, you may have additional rights with respect to your personal information. Please refer to the Section below entitled “California Resident Privacy Rights”.

Third Party Link

The Sites may contain links to third-party content, services or products by linking to a third-party’s website. If you click on a third-party link, you will be directed to that third-party’s website. DFS does not exercise control over third-party websites and is not responsible for the privacy practices or the content of any such third-party websites. Please note that if you provide any information to parties who provide services to us or to any other sites you encounter on the Internet (even if these sites reflect our branding), different rules and policies may apply to their use or disclosure of any personal information you disclose to them. We encourage you to check the privacy policies of third-party websites before providing your information to them. The fact that we may link to a third-party website or present a banner ad or other type of advertisement from a third party is not an endorsement, authorization, or representation of any affiliation by us with that third party, nor is it an endorsement of their privacy or information security policies or practices.

Third Party Analytic Services

We may work with certain third parties to collect, analyze, and use some of the information described above. For example, we may allow third parties to set cookies or use web beacons on the Sites or in email communications from DFS. The information collected by third parties using these technologies may be used to engage in analysis and reporting. These third parties may set and access cookies on your computer or other device and may collect information about your online activities across different websites or services over time, including on websites and mobile applications that are not owned or operated by DFS. In particular, the Sites may use Google Analytics to help collect and analyze certain information for the purposes discussed above. You may opt-out of the use of cookies in web browsers by Google Analytics by visiting Google’s website.

Security

DFS uses reasonable security measures designed to safeguard the personal information under our control from unauthorized access, use, and disclosure. Despite these measures, the confidentiality of any communication or material transmitted to or from us via the Sites by Internet or email cannot be guaranteed. DFS encourages you to learn as much as you can about your privacy on the Internet.

Children’s Online Privacy Protection Act

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Site or on or through any of its features or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

Notice to International Users

The Sites are hosted in the United States and are subject to U.S. law, and are intended for users located only in the U.S. If you are accessing the Sites from outside the United States, please be advised that U.S. law may not offer the same privacy protections as the laws of your jurisdiction. By accessing and using the Sites, you consent to the transfer to and processing of your personal information in the U.S.

California Resident Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. Subject to certain exceptions under California law, California residents may have the following rights with respect to their personal information collected by DFS:

- **The right to know and access.** California residents have the right to request DFS disclose (i) a copy of the personal information that we collect about you; (ii) the categories of personal information that we collected about you in the preceding 12 months; (iii) the categories of purposes for which such personal information was disclosed in the preceding 12 months; (iv) the categories of sources such personal information was collected for; and (v) the categories of third parties such personal information may have been shared with. There may be circumstances under which California law expressly excludes certain categories of information from DFS's disclosure obligations.
- **The right to deletion.** California residents have the right to request that DFS delete the personal information that we or our vendors collected about you. There may be circumstances under which we will be unable to delete your personal information, such as if we need to comply with our legal obligations or complete a transaction for which your personal information was collected. If we are unable to comply with your request for deletion, we will let you know the reason why.

If a California resident chooses to exercise any of these rights, DFS will not discriminate against the California resident in anyway.

To exercise any of these rights, contact us at Privacy@dfsfin.com or 800-648-8026. *In connection with submitting a request, you must provide the following information: name, phone number, address (or state of residency), dealer name (if services were provided through a dealer) and you must state what type of request you are making.*

Only a California resident, or someone legally authorized to act on such California resident's behalf, may make a verifiable consumer request related to his or her personal information. In general, DFS has the right to require you to provide written permission granting authority to your representative and for your agent to verify its identity directly with us, and we may deny a request from your representative who does not submit proof of authorization as we request.

A California resident may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows DFS to reasonably verify the requestor is the person about whom we collected personal information or an authorized representative and describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. DFS cannot respond to a request or provide personal information if we cannot verify the identity or authority to make the request.

DFS will endeavor to confirm receipt of a request within 10 days following submission and provide information about how we will process the request. DFS will endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to an additional 45 days), we will provide notice in writing explaining the reason for the extended time period.

Any disclosures we provide will only cover the 12-month period preceding the request receipt date. If we deny a request, we will provide a response explaining the reasons we cannot comply

with a request, if applicable.

DFS may have collected and disclosed the categories of personal information set forth in this Privacy Policy from a California resident for a business purpose in the preceding 12 months, and in the prior 12 months, DFS may have disclosed such categories of personal information for one or more of the purposes set forth in this Privacy Policy, including disclosure to a service provider or other third party of DFS's for a business purpose. DFS will not collect additional categories of personal Information or use the personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

In the prior 12 months, DFS has not sold personal Information of a California resident.

Additional California Resident Disclosures

Some web browsers have "Do Not Track" or similar features that allow you to tell each website you visit that you do not want your activities on that website tracked. At present, the Sites do not respond to "Do Not Track" signals and consequently, the Sites will continue to collect information about you even if your browser's "Do Not Track" feature is activated.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to Privacy@dfsfin.com.

Nevada Resident Rights

Nevada residents may have certain rights to opt-out of sales of their personal information under Nevada Revised Statutes Chapter 603A. However, please know DFS does not currently sell data triggering this Nevada statute's opt-out requirements.

Changes to this Privacy Policy

We may change this Privacy Policy at any time. The most current version of this Privacy Policy will be posted and available on the Sites. Any changes to this Privacy Policy will be effective at the time we post the revised Privacy Policy to the Sites. If we make material changes to how we treat your information, we will notify you through a notice on our Sites home page. Please review it periodically. Your use of the Site following any changes made means that you accept the revised Privacy Policy.

Accessibility

We are committed to facilitating the accessibility of our Sites for all people with disabilities. To access this Privacy Policy in an alternative format, please contact us Privacy@dfsfin.com or 800-648-8026.

Contact Us

Contact us with any questions or concerns you may have regarding this Privacy Policy at Privacy@dfsfin.com or 800-648-8026.