



Privacy Policy

Date of Last Revision: October 15, 2018

Our Policy:

Welcome to the website (the "Site") of Even Financial, Inc. ("EVEN," "we," "us" and/or "our"). This Site is operated by EVEN and has been created to provide information to our visitors ("you," "your") about our company and our online content, tools and services related to the marketplace lending market, whether such content, tools and services are accessed on the Site or through third-party websites, mobile sites and/or applications (together with the Site, the "Services"). This Privacy Policy describes how EVEN collects, uses and discloses information from visitors to the Services, including personally identifiable data ("Personal Data").

Please be sure to read this entire Privacy Policy before using or submitting information through the Services. By using or submitting information through the Services, you are indicating that you agree to be bound by the terms of this Privacy Policy. This Privacy Policy is incorporated into EVEN's Terms of Service at <https://evenfinancial.com/terms-of-service/>.

Information We Collect:

When you interact with us through the Services, we may collect Personal Data and other information from you, as further described below:

Personal Data That You Provide Through the Services: We collect Personal Data from you when you voluntarily provide such information, such as when you access, complete and/or use one of our online forms, tools or content items, contact us with inquiries, respond to one of our surveys, register for access to the Services or use certain Services. If you complete one of our online forms, you will be asked to provide Personal Data such as your email address, first and last name, street address (including zip code), telephone number, date of birth and social security number. We also collect information from a prospective borrower through the Services about his or her occupation, income, estimated credit score and the purpose and amount of the desired loan to assist in identifying potential loan products. Wherever EVEN collects Personal Data, we make an effort to provide a link to this Privacy Policy.

For clarity, EVEN collects Personal Data from you to, in part, provide you with personalized content and information related to loan products, but EVEN is not a lender. Any loan or related product to which you may become a party is solely transacted between you and the applicable lender and/or loan originator and is not a part of the Services.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. You represent that the Personal Data you provide is true, accurate, current and complete, and that you have the authorization to provide it to us. If you provide Personal Data to the Services, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of EVEN and the authorized third parties referred to herein located in the United States.



Other Information:

IP Addresses; Device ID Information: The requests you make to EVEN may contain your IP address (the Internet address of your computer). We may use visitors' IP addresses for various purposes, including to display customized content and analyze and report upon usage of the Services; to diagnose and prevent service or technology problems affecting the Services; and to monitor and prevent fraud and abuse. If you access the Services on a mobile device, we may also collect your device identification number and request access to settings and location information for similar purposes and to personalize your experience with the Services.

Non-Identifiable Data: When you interact with EVEN through the Services, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. We may store such information ourselves or such information may be included in databases owned and maintained by EVEN affiliates, agents or service providers. The Services may use such information and pool it with other information to track, for example, the total number of visitors to the Services, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process.

In operating the Services, we may use cookies, web beacons and similar technologies. A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Services. Cookies help provide additional functionality to the Services, customize users' experiences with the Services and help us analyze Services usage more accurately for research, advertising and marketing purposes. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Services' features.

In addition to cookies, we may use web beacons (also known as "clear GIFs") to measure traffic to or from or use of our online forms, tools or content items and related browsing behavior and to improve your experience when using the Services. We may also use customized links or other similar technologies to track hyperlinks that you click and associate that information with your Personal Data in order to provide you with more focused communications.

This Privacy Policy covers the use of cookies, web beacons and similar technologies by EVEN only. Uses of these technologies by third-party advertisers or websites linked from the Services, including third parties with which we partner, are governed by each such advertiser or website's privacy policy.

Aggregated Personal Data: In an ongoing effort to better understand and serve the users of the Services, EVEN often conducts research on our customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and EVEN may share this aggregate data with our affiliates, agents, lenders and service providers. This aggregate information does not identify you personally. EVEN may also disclose aggregated user statistics in order to describe our services to current and prospective lenders and service providers, and to other third parties for other lawful purposes.



Our Use of Your Personal Data and Other Information:

EVEN uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email to ask a question or report an issue with the Services, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to learn about loan products that may be available to you through third-party lenders and/or loan originators, we will use your Personal Data to provide you with information on such loan products and lenders and/or loan originators, to provide other personalized services, and/or to monitor your use of the Services. EVEN and our subsidiaries and affiliates (the "EVEN Related Companies") may also use your Personal Data and other personally non-identifiable information collected through the Services to help us improve the content and functionality of the Services, to better understand our users and to improve the Services..

Marketing: EVEN and EVEN's lenders and service providers whom we share your information for product pricing may use your Personal Data to communicate with you by email, postal mail, or by text message to provide you with:

- Information regarding your application status, or transactional information relevant to your account.
- Opportunities and promotions related to your submitted request available through the services or products of our lenders and service providers that we think may be of interest to you.
- Information or content – such as articles or white papers – that we believe would be of interest to you though e-mail, text messages, or postal mail.

We will send such emails only with your consent, which is gathered when you either register for EVEN's services or sign up for future communications. Each marketing-related communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. If EVEN intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

Our Disclosure of Your Personal Data and Other Information:

EVEN is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

Certain Business Partners: When we partner with other businesses to provide content or services to you or to such business partners, we may share relevant Personal Data in connection with such content or services. For example, we will share your contact and other information with a lender and/or service provider if the information you provide in one of our online forms or tools matches certain criteria for loan products offered by such lender and/or loan originator.

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Related Companies: We may also share your Personal Data with the EVEN Related Companies for purposes consistent with this Privacy Policy.



Agents, Consultants and Related Third Parties: EVEN, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and providing marketing assistance. When we employ another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Legal Requirements: EVEN may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of EVEN, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) protect against legal liability.

Your Choices:

You can visit the Services without providing any Personal Data. If you choose not to provide any Personal Data, you may not be able to use certain features of the Services.

Exclusions:

This Privacy Policy does not apply to any Personal Data collected by EVEN other than Personal Data collected through the Services. This Privacy Policy shall not apply to any unsolicited information you provide to EVEN through the Services or through any other means. This includes, but is not limited to, information posted to any public areas of the Services, such as forums, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and EVEN shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

Children:

EVEN does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on the Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to EVEN through the Services, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Websites:

This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by EVEN (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Services do not imply that EVEN endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Security:

EVEN takes reasonable steps to protect the Personal Data provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Services may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to EVEN via the Internet.



By using the Services or providing Personal Data to us, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Services or by sending an email to you. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at info@evenfinancial.com.

International Users:

All Personal Data is stored on servers in the United States and is subject to United States law. By choosing to use the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the state of New York and the adjudication of any disputes arising in connection with the Services will be in accordance with the Terms of Service at <https://evenfinancial.com/terms-of-service/>.

If you are visiting the Services from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and the global processing of such information. By providing your information you consent to any transfer and processing in accordance with this Privacy Policy.

Other Terms and Conditions:

Your access to and use of the Services is subject to the Terms of Service at <https://evenfinancial.com/terms-of-service/>.

Changes to EVEN's Privacy Policy:

The Services and our business may change from time to time. As a result, at times it may be necessary for EVEN to make changes to this Privacy Policy. EVEN reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

New Uses of Personal Data: From time to time, we may desire to use Personal Data for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

Your California Privacy Rights:

Applicable California privacy legislation permits visitors who 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 to access such information, please contact us as follows: info@evenfinancial.com. Within thirty (30) days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third



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parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.]

Access to Information; Contacting EVEN:

To keep your Personal Data accurate, current and complete, please contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via the Services.

Please also feel free to contact us if you have any questions about EVEN's Privacy Policy or the information practices of the Services.

You may contact us as follows: info@evenfinancial.com.