

Privacy Policy

Financial Privacy Notice

This Financial Privacy Notice applies to your interaction with LendingClub Bank, National Association and LendingClub Corporation or any of their subsidiaries, as may be applicable (collectively "LendingClub," "we," "us," "our").

LendingClub works with third-party providers who are contractually obligated to comply with our policies to protect information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used, and disclosed.

This Financial Privacy Notice is effective as of November 5, 2024.

FACTS WHAT DOES LENDINGCLUB DO WITH YOUR PERSONAL INFORMATION?

Why?	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.
What?	<div>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>Account balances and transaction history</li><li>Credit scores and employment information</li></ul></div>
How?	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 LendingClub chooses to share; and whether you can limit this sharing.

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

Reasons we can share your personal information	Does LendingClub share?	Can you limit this sharing?
<b>For nonaffiliates to market to you</b>	No	We don't share

To limit our sharing	<ul style="list-style-type: none"> <li>• Call 888-596-3157 — our menu will prompt you through your choice(s) or</li> <li>• Contact us at: <a href="mailto:privacy@lendingclub.com">privacy@lendingclub.com</a></li> </ul> <p><b>Please note:</b> If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call 888-596-3157 or go to <a href="http://www.lendingclub.com">www.lendingclub.com</a>

Who we are	
<b>Who is providing this notice?</b>	LendingClub Bank, National Association and LendingClub Corporation

What we do	
<b>How does LendingClub 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 LendingClub collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or deposit money</li> <li>• pay your bills or apply for a loan</li> <li>• buy securities from us</li> <li>• use your credit or debit card</li> <li>• make deposits or withdrawals from your account</li> <li>• make a wire transfer</li> </ul> <p>We also collect information about you from others, such as credit bureaus and other companies.</p>

What we do	
<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 - unless you tell us otherwise.

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>• LendingClub Bank, National Association</li> <li>• Consumer Loan Underlying Bond (CLUB) Depositor LLC</li> <li>• LendingClub Corporation</li> <li>• LC Boost, Inc.</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>• Nonaffiliates with whom we share can include other financial services companies, lenders, insurance companies, retailers, membership clubs, or other consumer service providers such as data processors, service providers, and companies that help us market our own products and third-party products that we believe may be of interest to you.</li> </ul>

Definitions	
<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>• Our joint marketing partners include other financial services companies, banks, lenders, insurance companies, or other consumer service providers.</li></ul>

## Other important information

**For California residents**

We do not sell personal information under California law. We will not share your non-public information with nonaffiliates for their marketing purposes except with your express consent or as otherwise authorized by California law. We will not disclose personal and financial information about you with companies we own or control (affiliates) or with companies we do business with to provide financial products and services (joint marketing partners) if you instruct us not to do so by following the instructions on the form called "[Important Privacy Choices for Consumers](#)," which contains additional choices for California residents. To make a request under California privacy law, you may email us at [californiaprivacy@lendingclub.com](mailto:californiaprivacy@lendingclub.com) for more information or fill out a request form at <https://www.lendingclub.com/californiaprivacy>. To opt out of cross-context behavioral advertising based on data covered by California law, visit the Privacy and Preferences Center.

**For Vermont residents**

We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Additional information concerning our privacy policies can be found at [www.lendingclub.com](http://www.lendingclub.com) or call 888-596-3157.

Other important information	
<b>For Nevada residents</b>	<p>We provide you this notice under Nevada state law. You may be placed on our internal Do-Not-Call List by calling us at 888-596-3157 or sending a message to <a href="mailto:privacy@lendingclub.com">privacy@lendingclub.com</a></p> <p>LendingClub Bank, National Association Attn: Compliance Department 2701 N Thanksgiving Way, Suite 300, Lehi, UT 84043</p> <p>Nevada law also requires us to provide you the following to obtain additional information:</p> <p>Office of the Attorney General 100 North Carson Street Carson City, NV 89701 Telephone: 775-684-1100 Email: <a href="mailto:AgInfo@ag.state.nev.us">AgInfo@ag.state.nev.us</a></p>
<b>For Alaska, Illinois, Maryland, and North Dakota Customers</b>	We will not share personal information with nonaffiliates either for them to market to you or for joint marketing – without your authorization.
<b>For Massachusetts, Mississippi and New Jersey Customers</b>	We will not share personal information from deposit or share relationships with nonaffiliates either for them to market to you or for joint marketing – without your authorization.

## Privacy Policy

This Privacy Policy applies to all online and offline interactions with LendingClub Bank, National Association and LendingClub Corporation or any of their subsidiaries, as may be applicable (collectively "LendingClub," "we," "us," "our"). This includes in connection with the products and services that we offer (each, a "Service"), including but not limited to all LendingClub owned websites and the subdomains thereof (collectively, the "Site") and the group of financial service technologies that LendingClub or any of its affiliates have developed to enable the services we facilitate or provide (collectively, the "LC Platform"). This Privacy Policy also applies to those whom we interact with in our business-to-business relationships. Below, we've outlined our practices relating to the personal information we collect from you.

LendingClub works with third-party providers who are contractually obligated to comply with our policies to protect personal information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used, and disclosed.

This Privacy Policy is effective as of November 5, 2024.

### 1. CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

We collect information you provide to LendingClub when you interact with us directly or through a third-party, such as when you register for a Service, apply for a credit or deposit account or to be an investor, sign up for our mailing list, or otherwise communicate with us. We use all the information we collect to operate, maintain, improve, and provide to you and others the features and functionality of Services and to create new features. The types of personal information we collect depends on the Services you request and use. Below is a list of categories of personal information we collect and have collected and disclosed for a business purpose, the sources from which the information was collected, the business purposes for which the information was collected, and categories of third parties with whom the information was disclosed to in the last 12 months. We may use this information for the purposes described herein or for any other purposes that we may specifically disclose at the time you provide, or we collect your information.

### Identifiers.

- **Types.** This personal information may include a real name, alias, postal address, telephone number, unique personal identifier, online identifier, Internet Protocol address, email address or other communication information, account name, social security number, driver's license number or state identification card number, passport number, or other similar identifiers or identity verification information. This information may also include club membership or reward-based program identifiers.
- **Sources.** We collect this information from you, and from third parties, including information we request from credit reporting agencies, public sources, service providers, and your friends or contacts. This information may include information you provide and that we receive through referral activities. With your permission, we may access and import information you control, such as your contact list available through your email accounts.
- **Purposes.** We use this personal information to verify your identity, facilitate transactions, to advertise to you, and to create your customer profile and account. We may use your contact list information, if you choose to provide it, so that we may invite your friends and contacts to use Services and to provide credit to you for referrals. Certain personal information must be supplied during the customer registration processes in order to meet our legal obligations, facilitate credit eligibility decisions, protect against fraud, and complete your transaction. We may use this personal information to communicate directly with you, such as to send you direct mail, email, text, SMS, iMessage, or other messages for marketing or advertising, or to suppress such messages. We may use this personal information to facilitate the distribution of rewards by providing the information to a service provider which may require you to agree to their own privacy policy to collect the reward. We may also send you Service-related emails or messages (e.g., account verification, change or updates to features of Services, technical and security notices). For more information about your communication preferences, see "Control Over Information" below.
- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers (such as purchasers of loans or other credit-related products), credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

### Financial Information.

- **Types.** This personal information may include payment and bank information, wire transfer information, credit card number, debit card number, full credit report, transactional information for financial accounts, account information including interest rates and balances, income information, and any other financial information available.

- **Sources.** We may receive financial information that you provide to us directly or through third-party services. We may also receive personal information about you from third parties, including information requested from credit reporting agencies such as TransUnion, Equifax, and/or Experian, and from other partners. We will collect personal information, which may include your credit history, credit scores and other attributes relating to creditworthiness from credit bureaus and other partners. We may also collect personal information from publicly available sources such as government agencies.
- **Purposes.** We use this financial information to process your transactions, to improve and expand our Services, and to determine your financial health. We use this information to determine creditworthiness and make offers of credit. If you register with us, we will use financial information about you to facilitate and service your account, and to help you better manage your financial health. If you register as an investor, we will use financial information about you to facilitate investing. We use this financial information to enable and improve services that help you monitor and manage your finances. We use this personal information to process your credit or deposit account application or transactions and enable payments and fund transfers with financial institutions. We use this financial information in connection with securitizations and other investment products with an interest in the credit product you obtained from or through us. We use financial information to comply with regulatory obligations related to all types of accounts. We use this financial information for creditworthiness if you are a borrower, to assess risks related to your transactions, and to help investors determine whether to commit to or purchase your credit product. If you consent to have LendingClub request your financial or payroll information directly from your financial institution or other source, we may work with a third party, such as Plaid, MX, or Argyle, to access and collect such information on our behalf. By providing your financial payroll information to the third party by using their services, you acknowledge and agree that such information accessed, collected, or transmitted by the third party for this purpose will be governed by the privacy policy of the third party. Plaid's privacy policy is available at <https://plaid.com/legal>. Argyle's privacy notice is available at <https://argyle.com/legal/consumers/privacy-notice>. MX's privacy policy is available at <https://www.mx.com/privacy-policy/>.
- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, originating banks other than LendingClub Bank, National Association, as applicable, purchasers, prospective purchasers, credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

## Commercial Information.

- **Types.** This personal information may include records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, including businesses visited by you and your purchasing interests. This personal information may include details about property used to secure a loan, such as vehicle information and location. Commercial information may also include information about the utilities you use, rewards and points-based incentive programs, program membership information, and information about your mobile device and carrier.
- **Sources.** We may receive commercial information that you provide to us directly or through third-party services. We may receive information about your property from public records or from third parties, including information we request from credit reporting agencies, and from other partners. We may receive personal information directly or indirectly from government agencies, including those with authority over vehicle licensing and registration or any other property used as collateral for a credit product. We may receive personal information about services you obtain directly from your service provider such as a healthcare provider. We may receive detailed shopping, browsing, and purchasing personal information when you use our StackIt browser plugin for online shopping rewards. If you ask



us to use your utility payment history to help determine your eligibility for a Service, then we may receive this information from your utility or a service provider that collects the information on our behalf. By providing your information to the third party, you acknowledge and agree that information accessed, collected, or transmitted by the third party for this purpose will be governed by the privacy policy of the third party. Financial transaction information may also include commercial information about purchases, purchasing or consuming habits and tendencies.

- **Purposes.** We use this information for creditworthiness and determining financial health, for verification purposes, for data analysis, to improve and expand our Service, for perfecting security interests, and to facilitate the delivery of services. For example, information about your automobile may be used to register a security interest if that automobile is used as collateral for an extension of credit. We may use information collected as part of a shopping rewards program for marketing and advertising purposes, to ensure that you receive the promised reward, or for other purposes that benefit our business such as data analysis. We may also use this information to help you better manage your financial health.
- **Disclosures.** We disclose information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers, credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

## Business Information.

- **Types.** This personal information may include personal information about your business, such as legal business name and company practice name, and other information about your company or practice such as fax, telephone number, website, relevant email addresses, physical address, business-related licensing information such as a license number, federal tax identification or social security number, and business or practice bank account information. This personal information may also include tax documents and any other sensitive or proprietary business information which may be required to assess the risk associated with extending credit to your business. This information may be collected, for example, when you become part of a LendingClub business program, apply for a business-related loan, or apply for a Service as self-employed.
- **Sources.** We may receive business information that you provide to us directly or through third-party services. We may receive personal information about your property from public records or from third parties, including personal information we request from credit reporting agencies, and from other partners. For example, we may also collect this information from your registration application submitted through provider agreement, business loan application, or from a personal loan application if you are self-employed.
- **Purposes.** We use this personal information for processing your application, facilitating transactions, for verification purposes, and to improve or expand our Services. We use this information in connection with securitizations and other investment products with an interest in the credit product you obtained from or through us. When you submit registration information to request to participate in the Lending Club Patient Solutions Program, we will use this information to verify the identity of the healthcare providers and the practice. We will also use the required personal information to facilitate activities and transactions that need to occur during the patient financing process. This includes maintaining regular communications with the healthcare practice concerning an application for financing or a completed funding, such as requesting additional information or assistance. We may also use this information to contact the practice if there is a problem completing a transaction or to discuss a refund, or a problem with a patient's application. We may also use this personal information to enable our financial services partners to implement automatic payments.

- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers, credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

### Network Activity and Location Information.

- **Types.** This personal information may include, but is not limited to, your browsing history, search history, geolocation data, and information regarding your interaction with an Internet web site, application, or advertisement. We may collect analytics and use information associated with our website, mobile application, or other interactive experiences.
- **Sources.** We collect this personal information from you and from third parties such as advertising networks, internet service providers, data analytics providers, government entities, operating systems of platforms, social networks, and data brokers. This personal information may be passed to us via cookies, pixels, or other tracking technologies described in Section 3 below. Geolocation data may be collected from your device, your browser, or from other sources such as metadata stored in images or files you provide to us.
- **Purposes.** We use this personal information for security, processing your application, facilitating transactions, helping you locate services, marketing, fraud detection, for verification purposes and to improve or expand our Services. For example, we use this personal information to better understand the effectiveness of our advertising activities and efficiency in our application process. We also use this information to better advertise to you and to track your use of our websites and the selections you make to satisfy regulatory obligations. Please refer to Section 2 below, which provides detailed information about our use of tracking technologies.
- **Disclosures.** We disclose information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, parties to a company transaction, and legally interested parties as described in Section 3 below.

### Audio, Visual, and Electronic Information.

- **Types.** This personal information may include a picture of you, digital or digitized signature, or audio, video, or chat recordings, as well as activity logs and session replay recordings. We may also collect other communications between you and LendingClub, or between you and a LendingClub service provider, including personal information you provide to an automated help system. We may collect analytics and use information associated with our website, mobile application, or other interactive experiences.
- **Sources.** We collect this personal information from you or from third-parties, and third-parties may collect information from you on our behalf. For example, we may collect a copy of a government issued ID that includes a picture from you, and we may collect a picture of you and your signature when you visit our offices. Your signature or digital or digitized signature may also be on documents we collect from you. We may collect this personal information from third-party service providers that provide member support and operations-related services. We may also collect, or direct service providers to collect, logs and chat transcripts associated with automated help programs that interact with you. We may also collect analytics and use information from mobile device applications, websites, or other software associated with interactive experiences.
- **Purposes.** We use this personal information for information security, fraud detection and prevention, quality control, and for processing your application, facilitating transactions, for verification purposes and to improve or expand our Services, websites, mobile applications, and interactive experiences.

- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers, parties to a company transaction, and legally interested parties as described in Section 3 below.

#### **Professional, Education, or Employment-related Information.**

- **Types.** This personal information may include work history, employer and employment information, profession, job title, work address and phone number, and other information related to your profession.
- **Sources.** We collect this personal information from you, and from third parties, including information we request from credit reporting agencies, and service providers. We also collect this personal information through referral activities.
- **Purposes.** We use this personal information to determine your creditworthiness if you are a borrower, assess risks related to your potential extension of credit, and to help investors determine whether to commit to or purchase the credit product you obtained from or through us. We may also use this personal information to enable or implement automatic payments. We may use this personal information for verification purposes, to improve or expand our Services, and for offering Services to you.
- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers, credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

## Other Sensitive Information.

- **Types.** This personal information includes other personal information related to your transactions with us or provided to us through linked accounts and systems, such as information about medical or educational services purchased with a credit product you obtained from or through us, insurance information such as automotive insurance numbers relating to an automobile loan or health insurance information. This personal information may also include detailed information about your purchases from bank, credit card, and other financial or transactional accounts. This information may also include "sensitive personal information" as defined by the California Consumer Privacy Act, which is described in Section 9 below.
- **Sources.** We may receive other sensitive personal information that you provide to us directly or through third-party services such as healthcare and educational service providers. This information may be included in application information and may also be provided as part of a transaction with a service provider.
- **Purposes.** We use this personal information for processing your application for an extension of credit, facilitating transactions, for verification purposes, regulatory requirements, to improve or expand our Services, and to offer Services to you.
- **Disclose.** We disclose sensitive personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, originating banks other than LendingClub Bank, National Association, as applicable, purchasers (such as purchasers of loans or other credit-related products), prospective purchasers, credit bureaus, parties to a company transaction, and legally interested parties as described in Section 3 below.

## Inference Information.

- **Types.** This information includes inferences drawn from any of the information in categories listed above. This information may indicate characteristics about you, such as preferences, habits, behavior patterns, and physical characteristics. For example, your picture may reveal physical characteristics, and transactional information may reveal patterns in spending, behavior, preferences, and other information.
- **Sources.** We gather the information above from a variety of sources as described in each category.
- **Purposes.** We may use this information to improve or expand our Services or for marketing purposes.
- **Disclosures.** We disclose personal information in this category with LendingClub companies, third-party service providers, other third parties such as joint marketing partners and companies with which you initiated a transaction, other providers of financial services at your request, parties to a company transaction, and legally interested parties as described in Section 3 below.

We may use any of the above categories of personal information for the following business and commercial purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- Helping to ensure security and integrity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, non-personalized advertising.
- 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 services, providing storage, or providing similar services on behalf of the business.
- Providing advertising and marketing services.

- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of our Services, and to improve, upgrade, or enhance our Services.

We may also use your personal information for any purpose you have consented to or for any other legitimate purpose unless otherwise prohibited by applicable law.

## **2. HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGY TO COLLECT INFORMATION.**

Like most websites and online services, we and our third-party partners automatically collect certain types of usage information when you use or attempt to use our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, which could include cookies, web beacons, locally stored objects, embedded scripts, location-identifying technologies, and similar technology (collectively, "tracking technologies"). They may also include audio, video, and chat recordings and transcripts, as well as activity logs and session replay recordings. These tracking technologies collect personal information about how you use a Service (e.g., the pages you view, the links you click, and other actions you take in connection with a Service), information about your browser and online usage patterns (e.g., IP address, browser type, browser language, referring / exit pages and URLs, pages viewed, whether you opened an email, links clicked), and information about the device(s) you use to access a Service (e.g., mobile device identifier, mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, and depending on your mobile device settings, your geographical location data (which could include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device), or we may be able to approximate a device's location by analyzing other information, like an IP address. We, or our third-party partners, may link your various devices so that content you see on one device can result in relevant advertising and content displayed on another device, and so that we may recognize and contact you on the various devices you may use. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for a Service. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

Our websites include social media features, such as the Facebook Like button. These features may collect your IP address and other information such as the page(s) you are visiting on our websites and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our websites. Your interactions with these features are governed by the privacy policy of the company providing it.

We use or may use the data collected through tracking technologies to (a) remember information so that you will not have to reenter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) recognize and contact you across multiple devices; (d) provide and monitor the effectiveness of our Services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our websites; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Services.

If you would prefer not to accept cookies, most browsers will allow you to adjust your browser settings to: (i) notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Blocking or deleting cookies may negatively impact your experience using a Service, as some features and services within our Services may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and



performed certain functions with it. Deleting cookies does not delete Local Storage Objects (LSOs) such as Flash objects and HTML5.

We and our third-party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see "Third-Party Tracking and Online Advertising" below.

### 3. DISCLOSURE OF PERSONAL INFORMATION

We may disclose any of the above personal information about you in the instances as described above and as further described below. For further information on your choices regarding information about you, see the "Control Over Information" section below.

We may disclose personal information about you with:

- **Originating Banks or Credit unions.** Originating banks that originate an extension of credit to you, other than LendingClub Bank, National Association, as applicable. If you request an extension of credit, we may provide personal information to the originating bank after the credit is extended. The use of information about you by your originating bank is also governed by that bank's privacy policy. If you request a product associated with a credit union, we may disclose your personal information to that credit union;
- **Providers of Financial Services.** Banks, credit unions, financial technology companies, and others entitled to receive your personal information. Such disclosure may be associated with a request by you, such as a request made in conjunction with an "open banking" arrangement or joint marketing arrangement with referral partners. Such disclosure may also be based on contractual arrangements as long as the contract prohibits the sale of personal information we provide, such as contracts with referral partners that include reporting obligations or validation of offer terms;
- **LendingClub Companies.** Other companies and brands owned or controlled by LendingClub and other companies owned by or under common ownership as LendingClub, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use personal information about you in the same way as we can under this Privacy Policy;
- **Third-Party Service Providers.** Third-party vendors and other service providers that perform services on our behalf, such as operational support services, data processors and companies that help us market our own Services and third-party products or services that we believe may be of interest to you. We work with a number of service providers who support our operations, including but not limited to electronic payment service providers and customer support call centers. We disclose personal information with these third parties to process the transactions you initiate or to perform other specific services on our behalf, such as collections or identity verification, creating and providing targeted advertisements, or providing marketing analytics services. Our service providers are legally required to keep personal information private and secure and adhere to applicable state and federal laws and regulations and to only use the personal information we provide in order to provide such services to us;
- **Other Third Parties.** Third parties at your request or as part of a transaction you initiated, such as financial services companies, lenders, insurance companies, retailers, membership clubs, or other consumer service providers. For example, if you requested a loan or other financial service via a personal finance platform such as Credit Karma, LendingTree, NerdWallet, TransUnion, or Experian, we may provide personal information back to your chosen platform about the resulting transaction as part of a joint marketing arrangement to ensure the platform has the information necessary about your requested transaction to fulfill their obligations to us, and to you. As another example, if we are unable to offer you an extension of credit or another product or service, you may be given the option to allow

us to disclose personal information about you to third parties which may be interested in offering you that product or service. We will disclose this information at your direction, which may be provided through interaction with or selection of a third-party offer presented on one of our websites;

- **Purchasers.** If we sell your loan or rights associated with your credit account, we may provide the purchaser or a purchaser's service provider with information about you and credit information, which may be used to process your extension of credit and for other purposes. We may provide the purchaser or the purchaser's service provider with information about you and other information associated with your credit account for the purchaser to satisfy a regulatory or legal obligation or exercise rights associated with their ownership interest, even after the purchaser has sold the credit account to another party or after the credit account has been closed. The information we disclose about you will be subject to the purchaser's privacy policy in addition to our own. Purchasers may also use this information for their direct marketing purposes if you create an independent relationship with the purchaser (e.g., by becoming a customer of the purchaser);
- **Prospective Purchasers.** Prospective purchasers of your credit account or rights associated with your credit account to evaluate the quality of the account, and other service providers involved in the sale or potential sale of your account or an interest in your account. For example, a credit account purchaser may need information about you before purchasing your account to determine the risk associated with the account;
- **Credit Bureaus.** We may disclose personal information about you with credit bureaus;
- **Parties to a Company Transaction.** Other parties in connection with a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings; and
- **Legally Interested Parties.** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement or government agencies; (b) to enforce our Terms of Use or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of LendingClub, our visitors, or others.

We may also disclose information with others in an aggregated or otherwise de-identified or anonymized form that does not reasonably identify you directly as an individual.

#### 4. CONTROL OVER INFORMATION

**Data sharing settings and modifying or deleting information about you:** If you have established an online account with us ("Online Account"), you can access and modify information about you (such as name, email address, and mailing address) that we collect online and maintain by visiting your profile in the Online Account. This section of the website is password protected to better safeguard information about you. As a registered user, you can update your password, email address, physical address, phone number, and certain bank account information at any time on the website. Requests to change any other information in your profile or remove your name or comments from our website or publicly displayed content can be sent to us at [support@lendingclub.com](mailto:support@lendingclub.com). We will respond to your request within a reasonable timeframe, but no longer than may be required under applicable law (see Section 9 below for requests under California privacy law). We may not be able to modify or delete information in all circumstances.

#### Data Retention

Due to the regulated nature of our industry, we are under legal requirements to retain data and are generally not able to delete consumer transactional data, credit or deposit account application data, or other financial information upon request. Certain regulations issued by state and/or federal government

agencies may require us to maintain and report demographic information on the collective activities of our membership. We may also be required to maintain information about you for at least seven years to comply with applicable federal and state laws regarding recordkeeping, reporting, and audits. Criteria used to determine the period of time information about you is retained are primarily related to legal requirements and usefulness of the information for the purposes it was collected. We may retain personal information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for any other legitimate business purpose.

**Opt-out from third-party sharing for direct marketing purposes:** As set forth in Section 9 below, if you are a resident of California and have previously opted in to have personal information about you shared with third parties for their direct marketing purposes, but no longer wish to have such information shared, please email us at [privacy@lendingclub.com](mailto:privacy@lendingclub.com) to request to not have your information shared in this manner.

**How to control your email communications preferences:** You can update your email preferences and stop receiving promotional email communications from us by clicking on the "Unsubscribe" link provided in such communications. We make every effort to process all unsubscribe requests within a reasonable amount of time. You may not opt out of Service-related communications (e.g., account verification, transactional communications, changes/updates to features of our Services, technical and security notices).

## 5. THIRD-PARTY TRACKING AND ONLINE ADVERTISING

**Interest Based Advertising.** We participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your browsing history. We may share, or we may permit third-party online advertising networks, social media companies and other third-party services, to collect, information about your use of our websites over time so that they may play or display ads about our Services, on other devices you may use, and on other websites, apps or services. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the site and other information. We and our third-party partners may combine this information with information collected offline or from other sources. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

**Social Media Widgets and Advertising.** Our Services may include social media features, such as the Facebook Like button, Twitter/X or other widgets. These social media companies may recognize you and collect information about your visit to a Service, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies.

We display targeted advertising to you through social media platforms, such as Facebook, Twitter/X, and others. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our Services while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. These advertisements are governed by the privacy policies of those social media companies that provide them.

**Cross-Device Linking.** We, or our third-party partners, may link your various devices so that content you see on one device can result in relevant advertising on another device. We do this by collecting information about each device you use when you are logged in to a Service. We may also work with third-party



partners who employ tracking technologies, or the application of statistical modeling tools, to determine if two or more devices are linked to a single user or household. We may share a common account identifier (such as an email address, device identifier or user ID) with third-party advertising partners to help recognize you across devices. We, and our partners, can use this cross-device linkage to serve interest-based advertising and other personalized content to you across your devices, to perform analytics, to measure the performance of our advertising campaigns, and to otherwise improve or expand our Service.

### Your Choices:

- Interest-based advertising. To learn about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative (NAI) online resources, at <http://www.networkadvertising.org/choices>, and/or the Digital Advertising Alliance (DAA) resources at <http://www.aboutads.info/choices>.
- Cross-device linking. Please note that opting-out of receiving interest-based advertising through the NAI's and DAA's online resources will only opt-out a user from receiving interest-based ads on that specific browser or device, but the user may still receive interest-based ads on his or her other devices. You must perform the opt-out on each browser or device you use.
- Mobile advertising. You may also be able to limit interest-based advertising through the settings on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest based ads" (Android). You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.
- Some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt-out again.

Google Analytics and Advertising. We use Google Analytics to recognize you and link the devices you use when you visit our websites or Services on your browser or mobile device, login to your Online Account, or otherwise engage with us. We may share a unique identifier, like a user ID or hashed email address, with Google to facilitate our Services. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "How Google uses data when you use our partners' sites or apps" located at <https://www.google.com/policies/privacy/partners/>. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On here <https://tools.google.com/dlpage/gaoptout/>.

We may also utilize certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the Doubleclick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Service. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences> or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

## 6. HOW WE PROTECT AND STORE INFORMATION ABOUT YOU

**Keeping information safe:** LendingClub understands that the personal information collected and shared with us by our customers, investors and business partners contains sensitive data. We take our role in

safeguarding information about you seriously. We maintain a security program that draws on industry standards and best practices. We take a defensive, in-depth approach to implementing physical, administrative, and technical safeguards to protect information against unauthorized access or misuse. The safeguards include preventive, detective, and corrective controls, for example: physical safeguards like access badges and a video monitoring system; administrative safeguards like an employee security training program, employment background checks, and access controls; and technical safeguards like perimeter security, encryption, two-factor authentication, and regular security monitoring with layered and complementary controls. In addition, we use:

- *Encryption & website certificates.* Encryption protects the information you share with us from the moment it leaves your computer until it reaches our systems. Look for the secure locked padlock on your browser, which signifies a secure web connection. Consult your web browser documentation for more information.
- *Session time-outs.* We employ session time-outs that will log you out of the website automatically after a period of inactivity. This reduces the risk of others being able to access your account if you leave your computer unattended.
- *Passwords.* You should never share your password with anyone. Your password is not known to any LendingClub employee or third party, and we will never ask for your password by phone or email. If you ever receive a communication claiming to be from LendingClub that asks for your password, you should immediately report it by contacting us at [security@lendingclub.com](mailto:security@lendingclub.com).
- *Identity theft protection.* To protect your identity at LendingClub, we have developed and implemented an identity theft prevention and response program that is designed to detect, prevent, and mitigate identity theft when borrowing or investing through the LendingClub platform. We utilize authentication technology to verify the identities of our customers, and have established processes, procedures, and training for LendingClub employees to identify and respond appropriately to identity theft indicators.

We also periodically review and adjust security safeguards as the threat landscape evolves. Ultimately no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, our policy is to take reasonable steps to investigate the situation and, where appropriate, communicate with affected individuals.

**Data storage and transfer:** Information collected by LendingClub may be stored and processed in the United States or any other country in which we or our affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which we or our parent, subsidiaries, affiliates, or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

## 7. CHILDREN'S PRIVACY

We do not knowingly collect or solicit any information from anyone under the age of 13 through our Services. If we learn that we have inadvertently collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us at [privacy@lendingclub.com](mailto:privacy@lendingclub.com).

## 8. LINKS TO OTHER WEBSITES AND SERVICES

Services may present links to and from third-party websites of our business partners, advertisers, and social media sites and our users may post links to third-party websites. If you follow a link to any of these

websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on third-party websites.

## 9. YOUR CALIFORNIA PRIVACY RIGHTS

In California, you may request the categories of personal information we have disclosed to third parties for their direct marketing purposes. To request this information, please email us at [privacy@lendingclub.com](mailto:privacy@lendingclub.com).

The California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) provides for additional rights for California consumers over their personal information. For purposes of the CCPA, personal information does not include publicly available information or lawfully obtained truthful information that is a matter of public concern. For purposes of this paragraph, "publicly available" means information that is lawfully made available from federal, state, or local government records, information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or by the consumer; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.

Your rights under the CCPA include: a) the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you; b) the right to request that we delete certain personal information about you which we have collected from you, subject to certain exceptions; c) the right to correct inaccurate personal information that we maintain about you; d) if we sell or share personal information, the right to opt-out of the sale or sharing of your personal information by us; e) if we or disclose sensitive personal information for reasons other than those set forth in the CCPA and its implementing regulations, the right to limit the use or disclosure of sensitive personal information by us; and f) the right not to receive discriminatory or retaliatory treatment by us for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for exercising CCPA rights. You may also have the right to appeal our response to your request.

These rights do not apply to personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (GLBA), including certain information relating to financial services we offer such as information about financial accounts, credit information, or information collected when you apply for a loan or other financial services. Other exemptions also apply, such as credit reports under the Fair Credit Reporting Act, and rights provided for under the CCPA are subject to reasonable limitations listed in the implementing regulations. Most of the information we collect is subject to the GLBA ("GLBA Information") and therefore not subject to the CCPA and the rights described above. However, GLBA Information may be subject to a different California law called the California Financial Information Privacy Act. Your privacy choices under this law are set forth in the form called ["Important Privacy Choices for Consumers."](#)

To the extent your information is subject to the CCPA, you may opt out of sharing of personal information for cross-context behavioral advertising by clicking on the Your Privacy Choices button on our home page at [www.lendingclub.com](http://www.lendingclub.com) or by directly visiting our Privacy and Preferences Center. Please note that this opt-out will not apply to personal information that is GLBA Information or is otherwise exempt from the CCPA.

You may exercise your other rights related to information subject to the CCPA by submitting the form at <https://www.lendingclub.com/californiaprivacy>. You will be asked to provide certain identifying information to verify your consumer request, such as your name, social security number, date of birth, email address, and your mailing address. You will be required to verify your email address, and to provide a picture of yourself holding a valid, government issued picture ID. This information allows us to confirm your identity so that we may process your request to know / access, delete, or correct your information. You may also send an email to [californiaprivacy@lendingclub.com](mailto:californiaprivacy@lendingclub.com) for more information. If you have a credit or other account with us, access to your account information is conveniently available by logging into your account. In connection with requests to correct, we may request documentation to support the request. We reserve the right to request additional information that may be necessary to verify your identity.

Also, you may designate an Authorized Agent to make a request under the CCPA on your behalf. To initiate such a request, your Authorized Agent will be required to complete the form at <https://www.lendingclub.com/californiaprivacy>, using the upload feature to provide the appropriate documentation. Additionally, you will be required to provide your signed written permission for the Authorized Agent to act on your behalf.

When not subject to an exemption, a category of information that is subject to the CCPA is referred to as "Sensitive Personal Information." This includes: a) a consumer's social security, driver's license, state identification card, or passport number; b) a consumer's 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; c) a consumer's precise geolocation; d) a consumer's racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership; e) the contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; and f) a consumer's genetic data. It also includes: (x) the processing of biometric information for the purpose of uniquely identifying a consumer; (y) personal information collected and analyzed concerning a consumer's health; and (z) personal information collected and analyzed concerning a consumer's sex life or sexual orientation. LendingClub does not use or disclose sensitive personal information if covered by and as described in the CCPA, except for the purposes specified in Section 1798.121(a) of the CCPA and implementing regulations.

**Notice of Financial Incentive.** LendingClub offers an optional browser plugin that consumers may choose to download and use for the purpose of collecting shopping rewards. When consumers use the browser plugin, LendingClub receives information about the consumer's shopping activity and purchases. This information may be used as described in Section 1 and elsewhere in this Policy and may be used to provide a financial incentive to the consumer for qualifying purchases in the form of a gift card or code that has an assigned value. LendingClub places a value on the data collected by this program that is equal to the financial incentive provided to the consumer. Consumers may stop the collection of this data by uninstalling the browser plugin.

LendingClub does not sell your personal information as described in the CCPA.

LendingClub does not sell or share personal information of minors as described in the CCPA.

**Employees, Contractors, and Job Applicants.** Our work-related privacy disclosure provides additional categories of personal information we may collect about employees, job applicants, and contingent workers and categories of how the information may be used. The work-related privacy disclosure can be found at <https://resources.lendingclub.com/ccpa-hr.pdf>.

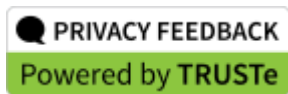
## 10. California Notice at Collection

To understand the types of personal information we collect and how we use it, please see above under "Categories of Personal Information We Collect and How We Use It." To understand how we disclose that personal information, please see above under "Disclosure of Personal Information." We do not sell or share your personal information. We will retain your personal information as described above under "Data Retention."

## 11. HOW TO CONTACT US

If you have any questions about this Privacy Policy or our websites, please contact us at [privacy@lendingclub.com](mailto:privacy@lendingclub.com).

If you have a privacy or data use concern, please contact us first at [privacy@lendingclub.com](mailto:privacy@lendingclub.com). If we have not addressed your privacy or data use concern satisfactorily, please contact our U.S.-based, privacy and data usage third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.



## 12. CHANGES TO OUR PRIVACY POLICY

We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date. If there are material changes to our sharing practices, we will provide you with notice 30 days prior to the effective date which we will post in our Policy Update page of our website. After the 30-day notice, your continued use of any Service constitutes express acceptance to all changes to the Privacy Policy. This Policy was last updated on November 5, 2024.