### **Clover Credit Privacy Policy**

### **Last Updated:**

**Pomo GoldJEM D/B/A Clover Credit** ("we," "us," or "our") respects your privacy and knows that you care about protecting your personal information. This privacy policy identifies what information we collect from you when you access or use <a href="www.clovercredit.com">www.clovercredit.com</a> (the "Site," including all subdomains), the services made available on and/or through the Site (the "Services"), and explains how we may use or share that information.

This Site primarily operates as a for-profit business website. This privacy policy applies to information we collect from you on the Site; through the Services; in email, text, and other electronic correspondence; and through any mobile application through which we may communicate.

#### **Links to Other Websites**

This Site may host links or connections to third-party websites. The Site does not review, nor endorse, any other third-party website, nor does the Site control how other third-party sites may use or collect information from consumers. We are not responsible for the consumer information use or collection policies, so please review them individually, as necessary.

### **Information We Collect**

We may collect and use the following types of information from those who use the Site and the Services:

- **Personally Identifiable Information (PII):** Information by which you may be personally identified, such as your name, address, email address, phone number, social security number, billing information, banking history, and credit card information, and other information that may not be publicly available.
- Non-Personally Identifiable Information (NPII): Information about you that does NOT identify you personally, including, but not limited to, your demographic information (for example, your age, gender, race, religion, political affiliation, and household income), personal interests, online interactions, viewing data, requests for Services, communications with us and third parties, advertisement interactions, survey and polling information, Site feedback or suggestions, search queries, and any other activities when using the Site or the Services.
- Account Information: Information you provide when you register with the Site and the Services, when adding or updating account preferences, and when subscribing for any Services, including income information, employment information, payment history, credit history, account balances, and bank account information.
- **Combined Information:** We may combine information you provide us with other information about you that we obtain from your past use of the Site and Services,

from our business partners, and from other companies. We will treat any NPII that is combined with PII as if it were all PII.

## What Does Clover Credit Do With Your Personal Information?

### Why?

Federal law requires us to tell you how we collect, share, and protect your personal information. Federal law gives consumers the right to limit some but not all sharing. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Name, Mailing Address, Phone Number, Email Address
- Social Security number and Date of Birth
- Credit History and Credit Scores
- Employment Information, including Income Information and Payment History
- Bank Account Information and Account Balances

#### How?

In the section below, we will explain how we may use or share your information, including the reasons that we may share your information and your ability to limit this sharing.

### **Reasons We Can Share Your Personal Information**

Reasons We Can Share Your Personal Information	Does Clover Credit Share This Information?	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	Yes	No
report to credit bureaus.  For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
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 (Mobile phone number opt-ins will not be shared)	Yes	Yes
For non-affiliates to market to you (Mobile phone	Yes	Yes

## **Reasons We Can Share Your Personal Information**

Does Clover Credit Share This Information? Can You Limit This Sharing?

number opt-ins will not be shared)

# **To Limit Our Sharing**

Call our toll-free number: (833) 276-2274

• Email Support@clovercredit.com

• If you are a new customer, we can begin sharing your information as soon as you sign your loan agreement. When you are no longer a customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

## **Questions?**

Call (833) 276-2274

#### What We Do

# How does Clover Credit protect my personal information?

- To protect your personal information from unauthorized access and use, we use security measures that comply with Federal Trade Commission regulations. These measures include computer safeguards and secured files and buildings.
- We also maintain physical, electronic, and procedural safeguards (e.g., computer virus protection software, firewalls, 128-bit Secure Socket Layer). Only authorized employees have access to your personal information.

### How does Clover Credit collect my personal information?

We collect your personal information, for example, when you:

- Apply for credit
- Give us your income information
- Provide employment information
- Provide account information
- Give us your contact information
- Communicate with us electronically via email
- Call our call center

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

### Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business
- Affiliates from using your information to market to you; and
- Sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing.

#### **Links to Other Websites**

This Site may contain links to, or from, other websites. This privacy policy only applies to information collected on this Site, and we are not responsible for other website's privacy practices. Please be aware that when you exit our Site using such links, you are bound by the privacy policies of the other websites. We encourage you to review the privacy practices of all other websites you reach through links on our Site.

# **Changes to the Privacy Policy**

We may update this privacy policy at any time. We will post any changes in our privacy practices on this page with the date of the most recent revision indicated next to "Last updated" near the top of the page. If we make significant changes to the way we manage our visitors' personal information, we may notify you by email or by posting prominent notice on our Site. We reserve the right to determine the most appropriate means of providing you with any notice required or advisable, in our sole discretion, under the terms of this privacy policy or as required by law.

# **Opt-Out Procedures**

As your privacy is important to us, we provide you with the following procedure(s) for opting out of future communications from us:

- **Email:** Send an email to Support@clovercredit.com explaining the specific communications or privacy practices you want to opt out of. You may also opt out by clicking "unsubscribe," or a similar button, at the bottom of any emails we may send you and then following the online instructions. However, please note that it may not be possible to opt out of certain emails (for example, confirmation emails related to services you have requested).
- **Phone:** Call (833) 276-2274 to receive help from our customer support team to opt out.

Opt-out requests will be honored, and we will do our best to stop communication immediately; however, it may take up to 30 days for previously initiated marketing campaigns to cease. Opt-out requests do not apply to non-marketing, informational, and/or

transactional communication from Pomo Gold D/B/A Clover Credit related to your customer account with us.

## **Third-Party Advertisers**

Clover Credit utilizes third-party marketers to promote its products and services. Third-party marketers initiate marketing campaigns using information in their own databases. Opt-out requests made to us will not necessarily prevent marketing from third-party marketers who rely upon their own mailing and contact lists. You will have to contact each directly to opt out of their individual mailing and/or contact lists. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

# **Third-Party Tracking**

We cannot control the privacy practices of third parties that use cookies, web beacons, or other tracking technologies associated with their content on the Site to collect information about your activities over time and across different websites. These third parties rely on their own privacy policies, not this one, and may have different practices and procedures for limiting their sharing of your information or opting out of their mailing/contact lists. Please review their privacy policies for more information. Additionally, you may opt out of tracking from members of the Network Advertising Initiative (NAI) by visiting its Consumer Opt-Out Page.

## Additional Rights for California Residents under the CCPA

Under the CCPA, California residents have the right to know and access your personal information.

- Know the categories of personal information we collect and the categories of sources from which we got the information;
- Know the business or commercial purposes for which we collect and share personal information;
- Know the categories of third parties and other entities with whom we share personal information; and
- Access the specific pieces of personal information we have collected about you.

**Deletion:** You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same).

**Opt-Out of Sale:** If a business sells personal information, you have a right to opt out of the sale of your personal information. (Please note: Clover Credit does not sell personal information.)

**Non-Discrimination:** You have a right to not be discriminated against for exercising these rights.

**How to Submit a Request:** To submit an access or deletion request, email Support@clovercredit.com or call (833) 276-2274. To opt out of the sale of your personal information, you may contact us in the same way. To verify your identity, we may ask you to provide personal information that matches the information we have on file.

For more information, please visit our California Privacy Notice page.

# **Children's Privacy**

The Site and Services are not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If we learn that we have collected or received personal information from a child under 13, we will delete that information immediately. If you believe we may have any information from or about a child under 13, please contact us immediately at Support@clovercredit.com or call (833) 276-2274.

### **How to Contact Us**

If you have any questions or concerns regarding this privacy policy, please contact us at:

Clover Credit [Contact Information] Email: Support@clovercredit.com Phone: (833) 276-2274