

Privacy Policy

Effective Date: July 16, 2025

This website is owned and operated by **Verifen Funding LLC** ("Verifen Funding"). We at **Verifen Funding** value and safeguard the privacy of visitors to our website, as well as the privacy of our customers. This Privacy Policy outlines how we protect your privacy and details our data collection and usage practices. It applies to and describes the handling of your information when you access our services, including our content located on this website, or any other websites, pages, features, or content we own or operate (collectively, the "Site(s)"), as well as third-party applications relying on our API, and related services (collectively referred to as "Services").

Verifen Funding is a small business marketplace dedicated to assisting small businesses with accessing and managing capital. This Privacy Policy applies to all users who interact with our Sites.

We encourage you to review **Verifen Funding's** Terms of Use. Where necessary, we will obtain your consent to process your personal information as described below. However, your use of our privacy policy signifies sufficient consent for **Verifen Funding** to collect and process your personal data in accordance with this Privacy Policy and applicable law. We may also provide additional "just-in-time" disclosures or information about specific data processing practices associated with particular Services. These notices may supplement or clarify our privacy practices and provide you with more choices regarding how we process your data.

Section Summary: This Privacy Policy explains how **Verifen Funding** collects and uses your personal data when you interact with our website and services.

1. Types of Information We Collect

1.1 Personal Information Collected

While **Verifen Funding** primarily collects information about your business, we inevitably collect **Personal Information** about business owners as they seek business capital. **Personal Information** is any data that identifies, relates to, describes, references, or can be reasonably linked with an individual or household. However, it does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

To create an account and use our Services, you may need to provide certain personal information. This may be required by law (e.g., for identity verification), necessary for the provision of requested services (e.g., bank statements for financial verification), or for other specific purposes described below. As our features and Services evolve, we may request additional information from you. Please note that failing to provide certain information may result in the inability to use some or all of our Services.

1.2 Types of Personal Information We Collect

During the course of offering services, **Verifen Funding** may collect the following information:

- **Personal Identification Information:** Full name, date of birth, utility bills, photographs, phone number, home address, IP address, social security number, and/or email.
- **Formal Identification Information:** Government-issued identification documents (e.g., Passport, Driver's License, National ID), Tax ID number, visa information, etc.
- **Business Information:** Employer Identification Number (EIN), proof of legal formation (e.g., Articles of Incorporation), personal identification information for beneficial owners.
- **Financial Information:** Bank account details, tax returns, federal and state tax IDs, financial statements, credit score, business invoices, and wire instructions.
- **Transaction Information:** Data about the transactions you make, including recipient names, transaction amounts, and timestamps.
- **Employment Information:** Office location, job title, role description.
- **Correspondence:** Survey responses, support communications, or information shared for research purposes.
- **Business Ownership Information:** Business type, ownership structure, officer details, articles of incorporation, etc.

1.3 Device/Digital Information Collected

We automatically collect certain information when you interact with our Sites or use our Services. This includes:

- **Online Identifiers:** Geolocation, operating system, browser information, device IP addresses.
- **Usage Data:** Authentication data, security questions, click-stream data, social networking interactions, and data collected via cookies and similar technologies.

This automatically collected information helps us improve our Sites' performance, address customer support inquiries, and enhance your experience while safeguarding against fraud.

1.4 Third-Party Information About You

From time to time, we may collect data from third-party sources, such as:

- **Public Databases & ID Verification Partners:** For verifying your identity as required by law.
- **Credit Bureaus:** With your consent, we may collect your credit information to better serve you and match you with suitable lenders.
- **Financial Institutions:** With your consent, we may gather data from your financial institution to assist with the underwriting process. We use services like Finicity, Ocrolus, and Plaid, whose privacy policies are available on their websites.

2. Methods of Information Collection

We gather information from you during the application process and through your interactions with our Sites.

As previously noted, when we require your consent to process your personal information, we will ask for it explicitly. We may also provide "just-in-time" disclosures or additional information about data processing practices for specific Services. If you do not agree with or are uncomfortable with any aspect of this Privacy Policy, we recommend that you immediately discontinue access to or use of our Services.

The personal information we collect comes from the following sources:

- **Directly from You:** For example, when you complete forms or use our Services.
- **Indirectly from You:** Through actions you take on our Sites.
- **Third Parties:** For example, when you connect to third-party services while using our Services.

2.1 Personal Information Collected During Application

To process your initial application for business funding, you may need to provide personal details, such as your name, address, phone number, email address, business name, and other related information. This data is primarily used to process your funding application and may also be used for purposes outlined in this Privacy Policy.

2.2 Email & Communication Preferences

When you register for our Services, we will collect your email address. This email is used for both transactional (e.g., application status updates) and promotional (e.g., newsletters, product updates) purposes. We may send emails that contain tracking codes to analyze your engagement with our messages, such as whether you opened the email or clicked any links.

You may also receive telephone calls or text messages related to our services. You may provide additional information during these interactions. If you prefer not to receive promotional emails, telephone calls, or text messages, you can opt-out by changing your preferences in your account settings or contacting us directly.

We comply with relevant laws, including the **U.S. CAN-SPAM Act, Telephone Consumer Protection Act (TCPA)**, and other applicable regulations governing communications.

2.3 Data Shared with Service Providers

Verifen Funding uses various service providers to enhance the customer experience. When you use these services, you may provide personal information to those providers, and they may share it with us. We may also share your data with these service providers in compliance with this Privacy Policy. We work to minimize the data shared with these providers and anonymize or aggregate your information when possible.

2.4 Log Files for Site Usage Analysis

Whenever you visit our Sites, our servers automatically collect certain information

from your browser, such as IP addresses, browser type, referring/exit pages, platform type, and timestamps. This information is used for analyzing trends, administering the site, preventing fraud, tracking user movement, and gathering demographic information.

2.5 Use of Cookies to Enhance User Experience

We use **cookies** to track information during your visit to our Sites. Cookies are small files stored on your computer that allow us to distinguish between new and returning visitors, save user preferences, and track trends. Cookies also enable us to personalize your experience and monitor site performance.

Some cookies transmit information about you to third parties, including advertising and analytics providers.

2.6 Web Beacons for Personalized Engagement

We may use **web beacons** (also called clear gifs or pixel tags), which are small, transparent images used in conjunction with cookies. Web beacons allow us to personalize your experience on our Sites and gather information about how you interact with our content. These may also be used in email communications to analyze customer engagement.

We do not link web beacon data to personally identifiable information.

2.7 Third-Party Data Collection Practices

In certain cases, we may collect information from third parties. This data is used to enhance our advertising, tailor our services, and match you with appropriate lenders. If you provide us with information about others, or if others provide us with your details, we will only use that data for the specific purpose for which it was provided.

We may also link to third-party websites, which have their own privacy policies.

We encourage you to review their privacy and security practices, as we are not responsible for their handling of personal information.

3. Purpose of Information Usage

3.1 Delivering Verifin Funding Services

We process your personal information to provide our Services. For example, when you apply for business financing, we require personal and financial information to match you with lenders and process your application.

3.2 Leveraging AI and Machine Learning for Service Enhancement

To enhance our Services, **Verifin Funding** uses Artificial Intelligence (AI) and Machine Learning (ML) models. These technologies may process your personal data as part of improving service delivery. We ensure our AI and ML models comply with all relevant laws and ethical standards.

3.3 Administrative and Service Communications

We send administrative or account-related information to keep you informed about updates, security alerts, or any changes related to your account. These communications are essential for the smooth functioning of our Services, and you cannot opt-out of receiving them.

3.4 Using Personal Information for Customer Support

We use your personal information to address questions, resolve issues, and support your experience with our Services.

3.5 Research, Development, and Service Improvement

We use the information we collect to analyze how you interact with **Verifen Funding's** Services. This helps us improve the functionality, content, and user experience of our Services. Your personal data is used to develop new features and enhance our offerings.

3.6 Customizing User Experience Based on Preferences

We use your personal information to provide a customized experience, implementing preferences you may have specified. For example, if you grant us access to third-party data, we can personalize your service experience.

3.7 Business Transactions and Corporate Changes

In the event of a merger, acquisition, or sale of assets, we may transfer your personal information. You will have the option to close your account if you do not wish to have your data processed for such purposes.

3.8 Legal Compliance and Regulatory Obligations

We process your personal information to comply with legal and regulatory requirements, including identifying and verifying customers as per commercial lending laws.

3.9 Enforcing Service Agreements and Terms

We use personal information to monitor and enforce our agreements, prevent illegal activities, and ensure that our users comply with our terms of service.

3.10 Fraud Prevention and Risk Mitigation

We process personal information to detect and prevent fraudulent activities, protect accounts, and mitigate any risks related to fraud or unauthorized use of our Services.

3.11 Quality Assurance and Staff Training

We use your data for quality assurance purposes, to maintain the accuracy and reliability of our Services. This ensures a smooth experience for all users.

3.12 Security Measures and Identity Protection

We process your personal information to enhance the security of our Services, prevent unauthorized access, and comply with applicable security regulations.

3.13 Data Anonymization and Aggregate Use

We may anonymize and aggregate customer data for business purposes. This anonymized data may be used for analysis, marketing, product improvement, and other internal uses. When you request that your personal information be deleted, we may retain anonymized or aggregated data as permitted by law.

4. Sharing Your Personal Data with Others

We may share your personal information with third parties in certain situations, as described below:

4.1. Legal Disclosure of Your Information

We may disclose your personal data if required by law, or if we believe that such disclosure is necessary to comply with legal processes or protect the rights and

property of our company or third parties.

4.2. Sharing Information with Financing Providers

When you apply for business financing, we may share your details with lenders, brokers, banks, and other Financing Providers in our marketplace. These providers may retain your information even if you do not engage in any agreement with them.

4.3. Disclosing to Trusted Partners

We share your data with trusted third parties offering services we think may benefit you, but only after you've shown interest (e.g., clicking links). These services include tax preparation, loans, credit repair, and more. We are not responsible for the actions or content of these third parties.

4.4. Working with Service Providers and Subcontractors

We may share your data with our subcontractors and service providers who assist us in delivering our services. These entities are contractually bound to use your information solely for the tasks we assign to them and are prohibited from selling it to others.

4.5. Sharing During Mergers or Acquisitions

If we undergo a merger, acquisition, or funding event, your personal information may be shared with those involved in the process. We will notify you in advance about any significant changes to our data handling practices.

4.6. Partnering with Third-Party Advertising Networks

Your information may be shared with third-party advertising networks to serve you personalized ads based on your behavior across platforms. These networks use cookies and other technologies to track and analyze your online activities.

4.7. Sharing with Professional Advisors

To comply with legal, financial, or other professional obligations, we may share your personal information with legal, accounting, and compliance experts who assist in auditing or advising our operations.

4.8. Miscellaneous Data Sharing

We may share your personal information for other purposes, provided you have given your consent or as required by law.

5. Managing and Controlling Your Data

You have rights to access, update, or delete your personal information. However, we may need to retain certain data to comply with legal requirements.

- **Accessing or Updating Your Data:** You can access and modify your contact details anytime by logging into your account.
- **Deactivating Your Account:** If you choose to stop using our services, you can deactivate your account. This prevents further data sharing with Financing Providers but doesn't delete your information.
- **Deleting Your Account:** Upon request, we will delete your account data where possible. If retention is required for legal reasons, we will deactivate the account and stop all communications.

We securely store your information and retain it only as long as needed for business or legal purposes.

6. Ensuring the Security of Your Information

We implement robust security measures, including encryption and secure storage, to protect your data. However, no online system is 100% secure, and while we strive to safeguard your data, we cannot guarantee absolute protection.

7. Opting Out of Marketing Communications

You can opt-out of receiving promotional communications by following the unsubscribe link in any email or by contacting us at support@verifen.com. This will stop all marketing messages but may not affect essential communications.

8. California Residents: Your Privacy Rights

This section applies specifically to California residents under the California Consumer Privacy Act (CCPA) and outlines your rights regarding personal data collection and use.

8.1. Personal Information We Collect

We collect several categories of personal data, including identifiers (name, email), financial information, browsing history, and other data.

8.2. How We Use Your Data

We use your information for various purposes, including service delivery, marketing, and legal compliance, as outlined in this policy.

8.3. Exercising Your CCPA Rights

As a California resident, you have the right to request access to, deletion of, and correction to your personal information. You also have the right to opt-out of the sale or sharing of your data and restrict the use of sensitive personal information.

8.4. Categories of Data Shared or Sold

We may share or sell certain personal information to third-party advertising partners for targeted advertising purposes. You can opt-out of this by filling out a request form.

9. Special Privacy Rights for Vermont Residents

Vermont residents are entitled to additional privacy protections under state law. We limit the sharing of personal information for Vermont residents, except as required by law or with explicit consent.

10. Changes to Our Privacy Practices

We may update this Privacy Policy from time to time. Any major changes will be communicated to you through email or a site notification. We recommend reviewing this page periodically to stay informed.

11. Protecting Children's Privacy Online

Our site is not intended for children under the age of 18. If we discover that a child under 18 has provided personal data, we will take steps to delete or anonymize that data promptly.

12. How to Contact Us

If you have questions about our Privacy Policy or wish to exercise your privacy rights, please reach out to us at:

Verifen Funding LLC

3044 Coney Island Avenue, Mailbox #7

Brooklyn, NY 11235

Phone: (888) 788-6160

Email: privacy@verifen.com