

PRIVACY POLICY

Information We Collect From You and About You

We collect personal and financial information from our members in addition to business information from our business fundraiser while they use the site, and most of this collection occurs during registration and financing application. Some information is required and some is optional, some will remain private and some will be displayed to other members. We always let you know which is which. Additional information may be gathered during your subsequent use of the site, whenever you choose to provide it.

Certain personal information must be supplied during the member, investor and fundraiser registration processes, as indicated below, in order to (a) enable registered users to login to the site, (b) determine business fundraisers' eligibility for financings, (c) verify fundraisers' and investors' identities, (d) establish fundraisers' and investors' ability to make and request financings by verifying that they are at least 18 years of age, and (e) guard against potential fraud. This basic personal information includes:

- Your name (member registration)
- Your email address (member registration)
- Your date of birth (fundraiser/investor registration)
- Your home address and telephone number (fundraiser/investor registration)
- Your Social Security number (fundraiser/investor registration)

When you register as a business fundraiser, we may use this information to pull a credit report from a specialized credit bureau to determine the creditworthiness of your business as well as to help investors assess your financing request in the context of your overall financial situation. We may also use your required and optional information to facilitate activities and transactions that need to occur during online person-to-business lending, such as:

- Generating fundraiser profiles accessible only to members on the site
- Assigning you a fundraiser credit grade based on a multitude of factors such as the business owners' credit history, financial circumstances, and D&B score.
- Enabling our financial services partners to implement automatic payments and fund transfers
- Contacting you if there is a problem completing a transaction you requested or to discuss a problem with your account
- Implementing collection activities as needed
- Maintaining regular communications with you concerning transactions you initiate, such as requesting information or assistance, submitting a financing request, making payments, transferring funds, etc.

When you register as a investor, we will request some required and optional data in order to facilitate such activities as:

Generating a public investor profile on the site



- Enabling our financial services partners to implement fund transfers and the receipt of fundraiser payments
- Contacting you if there is a problem completing a transaction you requested or to discuss a problem with your account
- Maintaining regular communications with you as may be necessary to execute transactions you request, such as submitting financing portfolios and transferring funds, etc.

In addition, we gather names and email addresses of people who contact us through our web site with questions about our company or lending/borrowing operations. We collect this information for the sole purpose of responding to such inquiries and do not store the contact information unless requested by these people, such as in the case of job applicants who submit resumes, etc.

Finally, we collect information about your computer and your visits to our web site, such as your IP address, geographical location, browser type, referral source, length of visit, and page views through the use of log files. We use this aggregated information in the administration of our web site to improve its usability and to evaluate the success of particular marketing/advertising campaigns, search engine optimization strategies and other marketing activities. We use non-identifying and aggregated information to help optimize our web site based on the needs of our users. No personal or personally identifiable information about any individual user is collected or will ever be distributed to third party organizations for any purpose, including marketing.

Tell-a-Friend and Other User Referral Activities

Users may choose to refer friends and colleagues to the site or directly to their financing listings via email or social media. If this referral occurs independently of our site or a partner's site, we do not track the referral other than as a unique page view. Since we do not collect any information from the referring party or the recipient of the external email referencing our site, we do not capture or store any information about either party. If friends refer each other to our site or to their financing listings via a partner's site, we will store and track information about the referring and receiving parties only long enough to determine the effectiveness of our marketing activities which contributed to the referral.

Users may choose to electronically forward a link or page to a friend by clicking the "share" link. The users must provide their own names and email addresses as well as those of the intended recipients in order for the email to be sent. This information is used only in the case of transmission errors as well as to let the recipient know who sent the email so that it is not mistaken for spam. The information is not used for any other purpose and we do not store the names or email addresses of your friends. These are one-time-only emails initiated by friends of the recipients, and the recipients are not added to any mailing list or contacted by Finance Georgia apart from this specific email.



Our users can also refer friends to the site by completing a simple form to generate an email invitation. In this case, the email invitations do not track back to any particular financing request, and the sender will not know whether you are a fundraiser, investor or simply a member. The information collected in this process is only kept long enough to monitor whether the referral program is achieving the desired results in terms of attracting new visitors to the site and converting them into members. Again, these are one-time-only messages initiated by friends of the recipients, and the recipients will not be added to any mailing list or contacted by Finance Georgia apart from this specific email.

Communications From Our Site

When you register on our site you will receive emails that confirm specific actions you requested. You will receive notifications confirming your registration, the successful verification of email addresses and bank accounts, and confirmation of successful submissions of financing requests and portfolios. You will also receive progress updates on the status of financing requests and submitted portfolios. These are transactional notifications that you cannot opt out of receiving, as they are in place to protect the security of your account and your personal information. We will also send you responses to any emails you send us. From time to time, we will also send user surveys and requests for user feedback regarding user experience and site operations. The completion of these surveys or requests for feedback is strictly voluntary. If you do not wish to receive these surveys or user feedback emails, you may opt out by writing to info@financegeorgia.com

How and When Your Information Is Shared With Other Parties

Information is shared with other parties in the following ways:

- Required and optional information about fundraisers and investors is displayed on profiles accessible only by members; certain information is optional and you can choose not to supply it and/or can remove the optional information at any time
- Information about fundraisers is contained in financing listings that can be viewed by all members
- Financial and credit information about business fundraisers is displayed to qualified investors on financing listing pages
- Information is shared directly between members. Information shared directly by members might contain personally identifiable information

For privacy purposes, investors remain anonymous on the site and are identified only by their chosen screen names. Fundraisers will be able to see the screen names of their investors and vice versa. However, fundraisers have public profiles and financing listings on the site that display their information to any users who view these pages. The financing listing pages may include fundraisers' credit grades and other financial information that is shown to qualified investors so that they can effectively evaluate financing requests. As noted above, this information is also contained anonymously in financing data files



available on the statistics page. Financing listings also contain certain personal information and, in some cases, answers to questions posed by investors that are incorporated into financing listings. Finally, members creating blog/forum posts are also identified by their screen names.

To protect fundraisers' and investors' privacy, however, the blog/forum posts do not track back to financing listings or financing funding decisions, respectively. Finance Georgia is not responsible for any personal information that fundraisers or investors may choose to reveal about themselves in their screen names, financing requests, blogs, or public profiles or blog/forum posts. Given the community nature of any person-to-person transaction site, however, it may be in the best interests of fundraisers and investors to share some level of personal information in order to achieve a satisfactory outcome (i.e., it may be necessary for you to share a certain amount of personal information in order for your financing to receive full funding).

If you use our blog on this site, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other users of this forum, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in this forum.

We may share your information with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your personally identifiable information when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site.

Finance Georgia works with a number of trusted partners that perform vital functions as part of our operations, including credit bureaus, collection agencies, electronic payment service providers, and customer support call centers. Information is shared with these third parties only to the extent necessary for us to process the transactions you initiate or perform other specific services, like collections. Our partners are legally required to keep your information private and secure.

How Your Credit History and Finance Georgia Financing Data Are Shared

When you create a financing listing, you will be posting personal information on the site that will be visible to all users. This information includes details about your financing request, as well as your screen name, geographic location, Finance Georgia credit grade and a description of the financing request.

Qualified Finance Georgia investors will also see certain credit data collected from or calculated based on your credit bureau file. It is necessary to allow prospective investors to see this information as they evaluate your financing request. The information displayed to investors includes a credit profile section and a credit history section. As noted above, this information is also contained anonymously in financing data files available on the statistics page.

The credit profile section may include your:



- Years of operation
- Number of employees
- Annual revenue
- GICS number
- Description of your business
- Financing use
- Monthly payment amount for the financing being requested
- Debt level
- Asset level
- Asset description
- Business plan
- Financial statements

If you successfully receive a financing through Finance Georgia, we will also display status information about your financing to your investors. Your financing tracks back to you by your screen name, so it is important that you choose a screen name that will protect your anonymity. You should not choose a screen name that resembles your actual name or that of any other person. Further, you should not include your name or personally identifiable information in your financing request. Your payment performance information such as late payments, collections activity or any other instances of delinquency will be displayed to your investors. Financing status information is also aggregated and displayed on the statistics page.

Notifications

Finance Georgia will send you email notifications from time to time, and these are required elements of your transactions on our web site, such as confirmations of particular actions you have taken. These required notices are sent typically to notify you of a change in status such as when you are confirmed as a fundraiser or investor, or for legal or security purposes. For example, certain notifications are sent for your own protection to ensure that no one can make a change to your account without your knowledge, such as confirming the addition of a new email address or linked external bank account. These notifications are sent to you so that you can be assured that no one is making changes to your account without your knowledge. In other cases, these notifications involve changes to various legal agreements or site policies. Generally you may not opt out of these service related emails.

Where You Can Find and/or Correct Your Information

You can access all of your personal and personally identifiable information that we collect online and maintain by visiting your profile in the My Account section of our site. This section of the site is password-protected to better safeguard your information. As a registered user, you can update your password, email address, physical address, phone number and bank account information at any time on the website, and if you need to



change any other information in your profile you can contact us at info@financegeorgia.com. To protect your privacy and security, please contact us at info@financegeorgia.com to make changes to your sensitive account information.

Web-related Information Collection

We use cookies on our web site, including session ID cookies, non-persistent cookies and persistent cookies. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser and load the pages according to a user's preferences for that particular site, including the personalization of content. Cookies are also used to gather statistical data, such as which pages are visited, what is downloaded, the ISP's domain name and country of origin, and the addresses of sites visited immediately before and after coming to our site, as well as your "click stream" activity (meaning, the paths taken by visitors to our site as they navigate from page to page) and transactional attributes in accordance with information you voluntarily submit in the course of using our site. This anonymous data is aggregated for analysis to ensure proper functioning of our site, in terms of navigation and usability, as well as to evaluate the effectiveness of our marketing efforts. At no time do any of our cookies capture any personally identifiable information.

More importantly, using cookies also helps us protect the security of your account. Session ID cookies follow your activities on our site so that we can ensure that no one is making changes to your profile, applying for financings or making financings on your behalf. This information is encrypted and no personal data about you is stored on our servers.

We may send a cookie that can be stored by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of our web site, to improve its usability and for evaluating our marketing effectiveness as described above. We may also use that information to recognize your computer when you visit our web site (if you select the "remember me on this computer" option, and to personalize our web site for you. Most browsers allow you to refuse to accept cookies. (For example, in Internet Explorer you can refuse all cookie by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector). Blocking cookies, however, can also have a negative impact on the usability of many web sites.

Cookies may have long-term expiration dates, or none, and thus can stay in your hard drive for months at a time. While you can remove them as instructed by the help content in your chosen browser, disabling cookies will prevent you from using our site. As with many transactional web sites, cookies must be enabled in order to use our site.

We use third-party tracking services (e.g. Omniture, Google Analytics) that use cookies to track non-personally identifiable information about visitors to our site in the aggregate (such as page views and referral page information to track the success of our marketing efforts to bring people to our site as well as overall site performance). We use respective



web beacons to gather information that lets us tune and improve our users' browsing experience, as well as track user responsiveness to various advertising campaigns and promotional activities. As with cookies, the information these beacons collect is aggregated, anonymous "click stream" and transactional data, and is not associated with any users as individuals. No personal or sensitive information is transmitted to advertising partners (but one such partner uses incoming IP addresses to avoid double-counting the number of new members who joined as a result of the advertising campaign).

If you would like more information about the use of third-party cookies and tags, or the process of opting out of such cookies or tags, please visit http://www.google.com/privacy.html.

Compliance With State and Federal Laws

This privacy policy may not constitute your entire set of privacy rights, as these may also vary from state to state. To be certain of your privacy rights, you may wish to contact the appropriate agency in your state that is charged with overseeing privacy rights of consumers. 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 your personal information for at least seven years in order to be in compliance with applicable federal and state laws regarding recordkeeping, reporting and audits.

Links to Other Sites

We may offer links to partners' sites. We make the decision to provide links to these sites based on the quality of information provided at the time the links are enabled, and we make every effort to monitor the continuing quality of content provided on these sites. However, these external sites are not subject to this privacy policy. Further, Finance Georgia has no control over the content of these sites. Please consult the privacy policies on these sites before you provide them with any of your personal information.

Finance Georgia Security Policy Industry-leading standards and controls

Finance Georgia takes strong steps to safeguard your personal and personally identifiable information through vigorous physical, electronic and operational policies and practices. All data is considered highly confidential. Data can only be read or written through defined service access points, the use of which is password-protected. The physical security of the data is achieved through a combination of network firewalls (there is no direct communication allowed between the database server and the Internet) and servers with hardened operating systems, all housed in a secure facility. Access to the system, both physical and electronic, is controlled and sanctioned by a high-ranking manager.



Further, we also equip our servers with Secure Socket Layer (SSL) certificate technology to ensure that you when you connect to our web site you are actually on our site. SSL also ensures that all data entered into the web site is encrypted. To verify that SSL is being used, look for the key or padlock icon on your browser. For further encryption protection, we use a 128-bit secure browser for logins and transactions. Finally, we subject our systems to periodic security audits to ensure that your information is thoroughly protected and secure.

Session time-outs

We also employ session time-outs to protect your account. You will be logged out of the site automatically after a specified period of inactivity. This time-out feature reduces the risk of others being able to access your account if you leave your computer unattended.

Protection of account numbers

When we contact you about your account to confirm a funds transfer, we only reference the last four digits of your bank account number; this is done for your protection so that you will recognize the source or destination account as one which you own. Further, we employ strict access standards ensuring that only the senior-most employees or partner representatives have access to your account numbers and other sensitive information. This access is only granted in order to complete transactions which you request or to provide regular ongoing service to your account.

Passwords

At a minimum, we require the use of both numbers and letters in your password. We have also instituted secure steps by which you can regain access to your account should you forget your password, including the use of a security question. Your password is not known to any employee or third party with whom we may partner, and we will never ask for your password as a means of identifying yourself. You should never share your password with anyone, and if you ever receive an email purporting to come from Finance Georgia that asks for your password, you should immediately report this development.

ID theft policy

Finance Georgia utilizes state of the art authentication technology to verify identities. However, if a investor suspects that one of their financings belongs to a person who has committed ID theft, please contact us at info@financegeorgia.com. Finance Georgia will work with law enforcement authorities to track down and prosecute anyone who has committed identity theft.

What you can do



In addition to our own substantial efforts, you can take several precautions to protect the security of your computer and personal information. For instance, you can start by using a well-chosen password. You should avoid using any information that others can easily learn about you, such as a family member's name or birthday, and you can also use special characters in place of letters. We also recommend that you change your password frequently. You can also install and regularly update antivirus and firewall software to protect your computer from external attacks by malicious users. When you are finished with a session on our site, be sure that you log out and close the browser window.

To protect your account, we send automatic notifications confirming certain actions taken on your account, such as changes to a password or external linked account. We do this for your own protection so that you can be sure no one else is making changes to your account without your knowledge. However, the security offered through these notifications can be undermined if other people have access to your email account. Therefore, you might consider restricting access to the email account you registered with on this site and/or changing your password on that email account frequently.

If you use a computer that is accessed by other people, such as in a public library or Internet cafe, we recommend that you take special precautions to protect the security of your account and personal data. When you are finished using our site, you should log out completely, then close the browser window and clear the browser's cache files.

You should also be aware of fraudulent attempts to gain access to your account information known as "phishing." Phishing is a tactic used by scammers in which unsuspecting people are brought to a web site by a genuine-looking email purporting to be from a legitimate company. The phony or "spoof" email takes the person to a web site that looks legitimate but in fact is not. Either in the email itself or on this fake site, scammers will ask for login information to gain access to people's accounts and withdraw their money. Finance Georgia will never ask you for your login information in the context of any email. In general, you can protect yourself against phishing by never providing personal or login information via an email—instead, go the web site directly. You might also make it a habit to check the URL of a web site to be sure that it begins with the correct domain. In the case of Finance Georgia, you should always ensure the URL begins with http://www.financegeorgia.com or https://www.financegeorgia.com

We May Make Changes to This Policy

As technologies, laws and user needs change, our site and its features will also change. This policy may be updated from time to time as such needs dictate, and we will always communicate these changes to you by posting them on this web site and/or by notifying you via email in the event of any substantive or material changes.

You may contact us at:

Finance Georgia, Inc.

Attn: Compliance Department



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