

PRIVACY POLICY

At Primeritus Financial Services, Inc. (“Primeritus”), protecting the confidentiality and privacy of your information is a fundamental part of our work.

This Privacy Policy explains how and why we collect, use, and disclose information, including personal information.

We do not sell or share personal information, including sensitive personal information. We collect, use, and disclose personal information solely to support the marketing of our services, and for other operational and administrative purposes. Primeritus is a business-to-business provider of services. Our services are not marketed to, or intended for, personal use by consumers.

INFORMATION WE COLLECT

When you visit our website, we collect information from your browser about the pages you visit.

When you fill out a form on our website, we collect personal information about you (e.g., name, email address, phone number, and any other information you provide in our form’s text fields), which you voluntarily provide in order to receive information or other services from Primeritus. Keep in mind that our website form will collect whatever data you write into our form’s text field; we therefore recommend that you not include sensitive personal information when you write to us.

When you email personnel at Primeritus, we collect your email contact information, which may be stored in our customer relationship system, that keeps track of the personnel with whom you are communicating and the services in which you have expressed interest.

When you provide employment information through our “Careers” link in our website, we collect the information indicated in that form that you may provide, including first and last name, email and physical address, phone number, whether you are over 18, immigration status, criminal conviction information, employment history, educational background, personal reference information, and any information you may provide in any resume you send us and/or type into any form field. The Careers link also gives applicants the option to voluntarily identify their gender, ethnicity/race, veteran status, and any disability.

When you communicate with us in the context of our business relationships, including in connection with any of the commercial services that we provide or services provided to us by third-party service providers, such as your contact

information and information we may collect during the course of our business relationship.

When we provide products and services to our customers.

We do not knowingly collect information via this website for anyone under the age of 18, nor do we market our services to them. If you are under eighteen (18), you should not provide any personal information to us.

WHERE WE GET PERSONAL INFORMATION

Directly from you, such as when you fill out an online form or communicate directly with our personnel.

Indirectly from you, when you browse our website.

From third parties, such as our customers, service providers like background screening agencies, government agencies, data brokers and social media networks.

HOW WE USE PERSONAL INFORMATION

Primeritus may use and/or disclose your personal information it collects for marketing, operational, and administrative uses. These uses may vary depending on the nature of our relationship with you, but may include:

- To provide you with the information that you have requested;
- To communicate with you about products and services;
- To operate, troubleshoot, analyze and improve our website and digital services;
- As reasonably necessary and appropriate, to detect or prevent fraud, to comply with legal obligations, or protect yours, ours, or others' rights;
- To fulfill other purposes permitted or required by law;
- To evaluate you for employment, if you have sought employment through the "Careers" link in our website;
- To provide our products and services to our customers; and

- For other uses disclosed to you, with your consent.

WHEN WE DISCLOSE PERSONAL INFORMATION

We disclose information to third parties when necessary to market our services, when we have your consent, or when required by law.

Primeritus may disclose personal information to its affiliates and subsidiaries for the purposes set out in this policy. However, under no circumstances does Primeritus sell, share, trade, barter, or exchange the information.

Where applicable, we may disclose your personal information to third parties in certain circumstances including the following:

- Disclosure to parties involved in the marketing operations and administration of Primeritus;
- Auditing related to counting ad impressions of unique visitors, verifying positioning and quality of ad impressions and auditing compliance with this specification and other standards;
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with Primeritus. Your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with the business;
- Performing services on behalf of Primeritus, 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;

- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Primeritus, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business;
- When we sell or merge any or all of our business and/or our assets to a third party; and
- Disclosures that are required by law.

When required, we obtain written contractual assurances from these third parties that their privacy and security practices are in accord with applicable legal requirements.

Primeritus uses third-party service providers to support our marketing program. With all website visitors, even those who do not complete any forms or otherwise seek our services, certain information is automatically collected through the use of third-party service, such as Google Analytics and similar technologies. This information helps us administer, protect, and improve our services; analyze usage; and improve users' experience. These third parties may collect personal information about your online activities over time and across different websites when you use the Primeritus website.

Through Google Analytics, the website collects online identifiers, including cookie identifiers, IP addresses and device identifiers. Google Analytics collects information and reports website usage statistics. To opt out of being tracked by Google Analytics, visit the [Google Analytics Opt-Out Browser Add-on](#).

The website also uses cookies, which are small files placed on the hard drive of your computer, to improve the operation and functionality of the website. The cookies we use may include:

- Process Cookies that enable the website to function properly and assist in navigating pages and accessing services. Without these cookies, the website may not function properly.

- Session State Cookies that collect information about how users interact with a website. This may include the page users visit most often and whether users get error messages from certain pages. These cookies help improve users' browsing experience but blocking or deleting these cookies will not render the website unusable.

Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our website. By using our website, you consent to our use of cookies and the placement of cookies on your device for the purposes described. Our website does not respond to "do not track" or similar signals.

We have no actual knowledge that we have sold any personal information of consumers under 16 years of age.

CALIFORNIA PRIVACY RIGHTS

If you are a California resident, please review our California Privacy Notice below.

DATA SECURITY

Primeritus secures data through a mix of physical, technical, and administrative safeguards that are audited annually by third-party information security experts. Primeritus also has policies and procedures designed to promote commercially reasonable security practices in accord with US and international requirements. Nonetheless, the transmission of information via the Internet is not completely secure, and we cannot guarantee the security of data sent to us electronically over cellular and wireless networks that we do not control.

CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on March , 2023. If we make any material changes in the way we collect, use, and/or disclose your personal information, we will notify you by posting a notice of the changes in a conspicuous manner on this website. Unless otherwise stated, the changes will go into effect as soon as they are posted to the website.

CONTACT INFORMATION

If you have any questions or comments about this policy, the ways in which Primeritus collects and uses your information, your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 1-833-402-8661

Email: compliance@primeritus.com

Postal Address:

2500 Murfreesboro Pike, Suite 105, PMB 307,

Nashville, TN 37217

Attn: Compliance

California Privacy Notice

This **California Privacy Notice** supplements the information contained in Primeritus' Privacy Policy and applies solely to website visitors who reside in California ("consumers" or "you").

INFORMATION WE COLLECT

The chart below provides additional information about the information we collect, the reason we collect it, and with whom it may be disclosed, e.g., the categories of third parties with whom the information may be disclosed. The chart further notes whether that information has been collected or disclosed in the past 12 months.

Category of Personal Information	Reason for Collecting and/or Disclosing	Categories of Third Parties	Collected or Disclosed in past 12 months
Common identifiers. E.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.	To our service providers, third parties when permitted by law; our customers and our affiliates	Collected and disclosed.

<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). This includes: A name, signature Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information</p> <p>Some personal information included in this category may overlap with other categories</p>	<p>For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.</p>	<p>To our service providers, third parties when permitted by law; our customers and our affiliates</p>	<p>Collected and disclosed.</p>
<p>Protected classification characteristics under California or federal law. This includes: Age (40 years or older), sex, veteran or military status.</p>	<p>For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.</p>	<p>To our service providers; third parties when permitted by law; our customers and our affiliates.</p>	<p>Collected and disclosed.</p>
<p>Commercial information. This includes: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories.</p>	<p>For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.</p>	<p>To our service providers; third parties when permitted by law; our customers and our affiliates.</p>	<p>Collected and disclosed</p>
<p>Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.</p>	<p>To our service providers; third parties when permitted by law; our customers and our affiliates.</p>	<p>Collected and disclosed</p>

Geolocation data. Physical location or movements.	To provide products and services to our customers.	To our service providers; third parties when permitted by law; our customers and our affiliates.	Collected and disclosed
Sensory data. Audio, information.	For marketing and administrative purposes; information security; website management; to comply with applicable legal requirements; to respond to claims or complaints; to provide products and services to our customers; and potentially to defend or prosecute legal claims.	To our service providers; third parties when permitted by law; our customers and our affiliates.	Collected and disclosed
Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	We collect this information in order to provide products and services in our business.	To our service providers; third parties when permitted by law; our customers and our affiliates.	Collected and disclosed
Sensitive personal information. Social security numbers; account log-in information;	We collect this information in order to provide products and services in our business.	To our service providers; third parties when permitted by law; our customers and our affiliates.	Collected and disclosed

CHOICES ABOUT YOUR DATA

Website visitors can take steps to limit the amount of personal information collected about you. As noted above, website visitors can use various tools to limit the amount of information collected by Primeritus and the third-party vendors it uses to support its website.

You may ask for information about the information collected about you. If we have collected personal information about you, you can request:

- To know the categories of personal information, including sensitive personal information, we have collected about you, the reason(s) we have collected it, the categories of sources of the information, the business or commercial purpose for collecting the information, and the categories of third parties with whom we disclose the information;
- To know the specific pieces of personal information, including sensitive personal information, we have collected about you (in addition to the information described above). If you have only provided personal information

as a result of browsing our website, i.e., you did not complete any forms or send Primeritus any emails or other communications, Primeritus may be unable to provide information about any specific personal data it holds about you, as we may not have any. Please refer to the table above for information about Primeritus' general data handling practices.

- To know what personal information, if any, is sold or shared and to whom.

You have the right to request that Primeritus correct inaccurate personal information about you.

You have the right to opt-out of the sale or sharing of your personal information, to the extent that Primeritus is engaged in such activity.

You have the right to limit certain uses and disclosures of your sensitive personal information.

You may also request that Primeritus delete the personal information it holds about you.

Please keep in mind, however, these requests are subject to various limitations by statute. Primeritus may deny certain requests as permitted by law.

Primeritus may retain personal information we have collected, as described in this policy, for as long as you use our services or as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

Data requests can be made in the following ways:

- **by writing us at the following address: 2500 Murfreesboro Pike, Suite 105, PMB 307, Nashville, TN 37217 ATTN: Compliance;**
- **by calling the toll-free Data Request number 1-833-402-8661; or**
- **by emailing compliance@primeritus.com**

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or the requestor's authority to make the request. An authorized agent may make a request on your behalf if they provide evidence of their legal authority to submit such requests.

Questions about the data request process should be directed to compliance@primeritus.com or **1-833-402-8661**.

Verifying your identity is required before we respond to your request. To verify your identity, we will collect basic personal information about you to match with our records. Next, you will receive an email confirmation that your request was received, as well as information about additional steps that may be required to confirm your identity and

verify appropriate contact information. You may make data requests no more than twice in a 12-month period.

We will try to respond to verifiable requests within 45 days. If we require more time, we will inform you of the reason and extension period in a written response. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request unless you request that Primeritus disclose the required information beyond the 12-month period unless doing so proves impossible or would involve a disproportionate effort. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will not retaliate or discriminate against you for exercising any of your rights under California law. You may appeal any of our decisions by contacting us at compliance@primeritus.com or 1-833-402-8661.