



Participate recognizes that the privacy and protection of User information is an important concern. This Privacy Policy describes Participate's policies and procedures on the collection, use, and disclosure of information gathered when you use Participate's Site. Participate will not use or share User information with any third-party, except as described in this Privacy Policy. Participate reserves the right to amend this Privacy Policy at any time in Participate's sole discretion. This Privacy Policy does not apply to information Participate collects in any way, including from other sources, other than through use of the website (including offline). Capitalized terms that are not defined in this Privacy Policy have the meaning given them in the foregoing Terms and Conditions.

INFORMATION COLLECTION

User Information: Users provide information about themselves, such as name, e-mail address, financial institution affiliation and title when setting up a profile on the Site. Such information and other information Users add to their profiles is available for public viewing on the Site, including viewing by unregistered Users of the site. Participate may use Users' email addresses to send Site-related notices (including any notices required by law, in lieu of communication by mail). Participate may also use contact information to send marketing messages. If a User does not wish to receive such messages, Users may opt out by following the instructions in the message. If a User corresponds with Participate by email, Participate may retain the content of such email messages, email addresses and related responses.

Users also provide information in User Content that are posted to the Site. User Content and metadata about it (such as posting time), are publicly viewable on the Site, along with identifying information such as name, title and financial institution affiliation. This information may be searched by search engines and be republished elsewhere on the internet, which Participate cannot control.

If a User chooses to use the invitation service offered by Participate to invite another User to the Site, Participate will ask you for that person's email address and automatically send an email invitation. Participate stores the information to send this email, to register that User if his or her invitation is accepted, and to track the success of the invitation service.

Borrower Information: As part of the loan participation process, Users provide certain personally identifiable information about borrowers and guarantors, both in the form of loan documents and other User-provided information. Participate only provides this information to other Users who are authorized by their financial institutions to receive this information and request it as part of the due diligence process prior to participating in a loan. Any use that such



other Users make of such information is governed by their respective privacy policies. Participate makes commercially reasonable efforts to keep this information confidential, both through technical measures and the requirements imposed on other Users in the Terms and Conditions. However, Participate cannot and does not guarantee that other Users will comply with the Terms and Conditions at all times.

Participate may use anonymized versions of this data for various purposes, including without limitation to determine general statistics on borrower demographics and purchaser interest, and to monitor commonly appearing terms in loan documents.

INFORMATION COLLECTED ABOUT USERS BY THE SITE

In addition to information that you provide to Participate, Participate also automatically collects additional information about usage of the Site, including:

1. Cookies: When a User visits the Site, Participate may send one or more "cookies" - small data files - to the User's computer to uniquely identify the browser, let Participate help the User log-in faster and enhance the User's navigation through the Site. A cookie may convey to Participate anonymous information about how a User browses the Site, but does not collect personal information about a User. A persistent cookie remains on a User's computer after closing his or her browser so that it can be used by the browser on subsequent visits to the Site. Persistent cookies may be removed by following the User's web browser's directions. A session cookie is temporary and disappears after a User closes his or her browser. Users may reset their web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Site may not function properly if the ability to accept cookies is disabled.

2. Log Files: Log file information is automatically reported by a User's browser each time he or she accesses a web page. When using the Site, Participate's servers automatically record certain information sent by a User's web browser whenever you visit any website. These server logs may include information such as the web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other similar information.

3. Third-Party Services: Participate may use third-party analytics services to help understand use of the Site. These services collect the information sent by a User's browser as part of a web page request, including cookies and IP addresses. Use of this information is governed by the Privacy Policies of those third parties.

INFORMATION SHARING AND USAGE

Participate uses information to analyze how the Site is used, diagnose service or technical problems, maintain security, personalize content, remember information to help Users efficiently access their accounts, monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns, and track User Content and Users as necessary to comply with the Digital Millennium Copyright Act and other applicable laws and regulations.

User Personally Identifiable Information: Participate may share personally identifiable User information with third parties as part of providing the Site to Users. If so, such third parties' use of User information will be governed by their own privacy policies. Participate may store personal information in locations outside the direct control of Participate (for instance, on servers or databases owned and managed by third parties).

As Participate develops its business, Participate may buy or sell assets or business offerings. User, email, and visitor information may be one of the transferred business assets in these types of transactions. Participate also may transfer or assign such information in the course of corporate divestitures, mergers, or dissolution.

Participate may share or disclose User information with consent, such as if a User chooses to sign on to the Service through a third-party service. Participate cannot control third parties' use of User information and takes no responsibility for such use. Personally identifiable information about individual User that Users provide on a User profile is publicly available, and may be seen by persons not registered for the Site. The User profile is available in a publicly available format that allows it to be viewed and stored by search engines.

Participate may disclose User personal information if required to do so by law or subpoena or if Participate believes that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect the rights or property of Participate.

Personally Identifiable Information Provided by Users about Borrowers: Participate will never share personally identifiable information about borrowers or guarantors with third-parties (other than Authorized Users of the Site as described above), unless required to do so by law or subpoena or if Participate believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect the rights or property of Participate.

Non-Personally Identifiable Information: Participate may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third-parties to help them understand the usage patterns



for certain Participate services. Participate also may generate publicly available statistical data for the lending industry based on non-personally identifiable information or anonymized personally identifiable information gathered on the Site.

Participate may allow third-party ad servers or ad networks to serve advertisements on the Site. These third-party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on Participate. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or web beacons) to measure the effectiveness of their advertisements and to personalize the advertising content. Participate does not provide any personally identifiable information to these third-party ad servers or ad networks without your consent. However, please note that if an advertiser asks Participate to show an advertisement to a certain audience and you respond to that advertisement, the advertiser or ad server may conclude that you fit the description of the audience they are trying to reach. The Participate Privacy Policy does not apply to, and Participate cannot control the activities of, third-party advertisers. Please consult the respective privacy policies of such advertisers for more information.

HOW PARTICIPATE PROTECTS USER INFORMATION

Participate uses commercially reasonable physical, organizational, and technical safeguards to preserve the integrity and security of your personal information. Participate does not, however, ensure or warrant the security of any information transmitted to Participate or guarantee that your information on the Site may not be accessed, disclosed, altered, or destroyed by breach of any of Participate's physical, organizational, or technical safeguards.

In the event that Participate knows that User personal information has been compromised as a result of a security breach, Participate will promptly notify Users whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

CHOICES ABOUT USER INFORMATION

A User may decline to submit personally identifiable information through the Site by choosing not to create an account. Without an account, many features of the Site will be unavailable. You may update or correct your account information and email preferences at any time by logging in to your account.



CHILDREN'S PRIVACY

To the extent that Participate is able to determine the age of Users by their submissions to, or communications with, the Site, Participate will not knowingly (a) collect or post information from individuals under 18 years of age ("Children" or "Child") without their parent's or guardian's consent, or (b) provide any personally identifying information collected from Children, regardless of its source, to any third party for any purpose whatsoever.

LINKS TO OTHER WEB SITES

The Site may contain links to other web sites. Participate is not responsible for the practices employed by websites linked to or from the Site, nor the information or content contained therein. Please remember that when you use a link to go from the Site to another website, Participate's Privacy Policy no longer applies. Participate does not guarantee the accuracy or completeness of any information on such sites. Your browsing and interaction on any other website, including those that Participate links to, is subject to that website's Privacy Policy which you should review.

RETENTION & DELETION

Participate will only retain the User's information for as long as necessary for the purpose for which that information was collected and to the extent required by applicable law or regulation. Upon Participate's discretion, Participate will remove the User's information from the System. This does not affect any information that has been gathered or received by a third-party.

CALIFORNIA RESIDENTS

California Civil Code Section 1798.83, also known as the "Shine The Light" law permits our Users who are California residents to request and obtain from Participate, once a year and free or charge, information about categories of personal information (if any) Participate disclosed to third-parties for direct marketing purposes and the names and addresses of all third-parties with which Participate shared personal information in the immediately preceding calendar year.

If you are a California resident and would like to make such a request, please submit your request in writing to Participate using the contact information provided on the Site.

If you are under 18 years of age, reside in California, and are a User, you have the right to request removal of unwanted data that you publicly post on the Site. To request removal of such data, please contact Participate using the contact information provided on the Site and include the



email address associated with your User account and a statement that you reside in California. Participate will make sure the data is not publicly displayed on the Site, but please be aware that the data may not be completely or comprehensively removed from all Participate systems (e.g., backups, etc.).

CCPA Privacy Notice: This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below. The California Code of Regulations defines a "residents" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose; and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, Participate must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data:

Right to request deletion of the data - Request to delete. You can ask for the deletion of your personal information. If you ask Participate to delete your personal information, Participate will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know. Depending on the circumstances, you have a right to know:

- (1) whether Participate collects and uses your personal information;
- (2) the categories of personal information that Participate collects;
- (3) the purposes for which the collected personal information is used;
- (4) whether Participate sells or shares personal information to third parties;
- (5) the categories of personal information that Participate sold, shared, or disclosed for a business purpose;
- (6) the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- (7) the business or commercial purpose for collecting, selling, or sharing personal information; and
- (8) the specific pieces of personal information Participate collected about you.



In accordance applicable law, Participate is not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Right. Participate will not discriminate against you if you exercise your privacy rights.

Verification Process: Upon receiving your request, Participate will need to verify your identity to determine you are the same person about whom Participate have the information in our system. These verification efforts require Participate to ask you to provide information so that Participate can match it with information you have previously provided Participate. For instance, depending on the type of request you submit, Participate may ask you to provide certain information so that Participate can match the information you provide with the information Participate already has on file, or Participate may contact you through a communication method (e.g., phone or email) that you have previously provided to Participate. Participate may also use other verification methods as the circumstances dictate.

Participate will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, Participate will avoid requesting additional information from you for the purposes of verification. However, if Participate cannot verify your identity from the information already maintained by Participate, Participate may request that you provide additional information for the purposes of verifying your identity and for security or fraud prevention purposes. Participate will delete such additionally provided information as soon as Participate finish verifying you.

Other privacy rights:

- (1) You may object to the processing of your personal information.
- (2) You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- (3) You can designate an authorized agent to make a request under the CCPA on your behalf. Participate may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- (4) You can opt out from the selling or sharing of your personal information.

To exercise these rights, you can contact Participate by visiting <https://participateloan.com>, or by referring to the contact details located on the Site. If you have a complaint about how we handle your data, we would like to hear from you.



DO NOT TRACK REQUESTS

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“Do Not Track”) feature or setting, which you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing Do not Track signals has been finalized. Participate does not currently respond to web browser’s Do Not Track signals that provide a method to opt-out of the collection of information about visitors’ activities on the Site. If Participate does so in the future, Participate will provide all relevant information in this Privacy Policy.

PARTICIPATE’S RIGHT TO CHANGE THIS PRIVACY POLICY

Participate may change this policy at any time. If so, Participate will post those changes on this page. Users should revisit this page from time to time to remain familiar with current privacy policies, as it is the User’s responsibility to periodically review this policy to stay informed of updates. Changes to this Privacy Policy are effective when posted.

CONTACT US

If Users have questions or comments about this Privacy Policy, you may contact Participate at <https://participateloan.com>.