

Online Privacy Policy

This Online Privacy Policy (Policy) applies to this Gearfire Capital online interface (i.e., website or mobile application) and any Gearfire Capital affiliate or subsidiary online interface that links to this Policy. Gearfire Capital has provided this Online Privacy Policy to describe our personal information handling practices, and to assure you of our continuing commitment to protect all personal information that we handle in the course of commercial activities. “COMPANY” or “we” or “us” or “our”, as used in this Policy, means Gearfire Capital and any of its affiliates or subsidiaries. The term “personal information”, as used in this Policy, means information about an identifiable individual.

When you submit information to or through the Website, you consent to the collection and processing of your information as described in this Privacy Policy. By using the Website, you accept the terms of this Privacy Policy. **IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TOU, THEN PLEASE DO NOT USE THE WEBSITE.**

Personal Information Collected

COMPANY limits the amount and type of personal information collected to that which is necessary for our identified purposes, and we collect personal information directly from you and your use of the Website by fair and lawful means. Personal information that we collect includes:

- Customer name and contact information; and
- Credit history and credit scores.

Sensitive personal information that we collect includes:

- Social Security and Income;
- Driver’s License; and
- Bank Account Information.

We collect personal information and sensitive personal information from you when you submit information to us in connection with using any of our services, contact us, or otherwise voluntarily provide it.

There is also information about your computer hardware or software that is automatically collected by COMPANY. This information may include your IP address, browser type, domain names, access times, and referring website addresses. Generally, we do not consider such data as personal information because it, by itself, usually does not identify an individual. This information is used by COMPANY for the general operation of its business, to maintain quality of service, and to provide general statistics regarding the use of COMPANY and operation of the Website.

COMPANY’s Website is for a general audience. COMPANY does not knowingly collect any personal information from anyone under the age of 16. Any personal information collected through the Website is processed in the United States or in other countries in which we or our affiliates, subsidiaries, or service providers host the Website or services. When you provide personal information to us through the Website, you consent to the

processing of your data in, and the transfer of your data to, the United States or any other country in which we or our affiliates, subsidiaries, or service providers host Website or services.

Personal Information Security

To protect your personal information from unauthorized access and use, we use appropriate security measures designed to protect the security of all information submitted through the Website. These measures include technical, physical, and administrative safeguards.

Although COMPANY endeavors to protect your personal information, it cannot guarantee the security of your personal information transmitted to the Website. Any transmission of personal information is at your own risk. Users of the Website are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of our services. To protect you and your data, we may suspend your use of any of our services, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure areas of any of the Website are restricted to authorized users only.

Use of Personal Information

COMPANY may disclose personal information in a number of circumstances, including:

- To credit bureaus, credit reporting agencies and to your current or future creditors for the purpose of maintaining your credit history and providing credit references;
- To third parties as reasonably necessary to support our business;
- To enforce your contracts with us and otherwise for the collection or payment of a debt owed to us;
- For the purposes of detecting and preventing fraud;
- To affiliates and other third parties in connection with audits, management, billing or other administrative purposes, including defending and bringing legal actions;
- For the purposes of meeting legal, regulatory, industry self-regulatory, risk management and security requirements;
- For providing payment solutions;
- Unless you have opted out, to affiliates of COMPANY to enable them to offer you additional products and services;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, dissolution, or other sale or transfer of some or all of COMPANY's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding;
- For other purposes you have consented to or have provided it for;
- To comply with a court order, law, or legal process, including to respond to any government or regulatory request;
- As otherwise permitted or required by applicable law.

Information that you provide that we share with any participating lenders in connection with services you request will be handled in accordance with the third-party lender Privacy Notice (provided to you separately on behalf of such third-party lenders).

COMPANY may also use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sale, divestiture, restructuring, dissolution, assignment or other disposal of all or part of COMPANY or our business or assets (including your loan or lease and any agreement to which it relates), for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of COMPANY or our business or assets may use and disclose your personal information for similar purposes as those described in this Policy.

Use of Cookies

COMPANY may use cookies, web beacons, or other technologies to collect information about you when you use our website. A “cookie” is a small data file that certain websites write to your hard drive when you visit them. If you prefer not to receive cookies through our website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser. If you choose not to accept cookies, some of the features of the Website may be disabled or rendered unusable. Cookies enable us to improve the Website by customizing user experience with the Website, analyze technical and navigational information about the Website, and detect and prevent fraud.

Disclosure of Personal Information

In the course of fulfilling the purposes described above, COMPANY may transfer your personal information to service providers, including affiliates or other third-party organizations or individuals retained by COMPANY to perform functions on its behalf, such as marketing, data processing, customer service, office, security, collections, insurance, financial and taxation services. We may disclose information as described at the time the information is collected or as follows:

- To present this Website or to perform services;
- With service providers performing services on our behalf;
- For legal purposes;
- To fulfill the purpose for which you provide it;
- With your consent;
- For any other purpose disclosed by us when you provide the information;
- To apply our terms of use and other agreements; or
- To facilitate corporate changes such as a merger, sale, acquisition, or other change of ownership or control; or
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of COMPANY, our customers, or others.

When personal information is transferred to service providers, we use contractual or other means to ensure that a comparable level of protection is provided. Some of our service providers may be located outside the United States and will be subject to applicable legal requirements in that country including lawful requirements to disclose personal information to government authorities in certain circumstances.

Online Advertising

Our advertising management partners may use data collection tools through the Website to enable them to recognize a unique cookie that has been placed on a user's browser, which in turn enables us and these ad management partners to learn which advertisements bring users to the Website. In addition, we and our ad management partners may use these data collection tools to track the actions of users of the Website, to measure statistics of our marketing efforts, and to deliver advertisements that may be more relevant to you. We and our ad management partners also may use data collection tools to record the actions of users of the Website, to measure statistics of our marketing efforts, to deliver advertisements that may be more relevant to individual consumers and to improve the consumer experience on the Website.

Users may “opt out” of receiving online interest-based advertisements by following the instructions at www.aboutads.info/choices or www.networkadvertising.org/choices/. After opting out, an “opt-out” cookie will be placed on the user's device indicating that the user does not want to receive interest-based advertisements. If a user deletes cookies generally, the user will need to opt-out again.

Important Information About Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account (with one of our third-party lenders). What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents. You agree that this information is required by our third-party lenders and will be shared with such third-party lenders in connection with your request for our services.

Changes to Your Contact Information

If your personal information changes, you can update or correct it by contacting COMPANY at 833-341-2378 or via email at customerservice@gearfirecapital.com. We will retain your information for as long as needed for our operations. In addition, we retain personal information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our TOU, and perform other actions permitted by law. After it is no longer necessary for us to retain information, we dispose of it according to our data retention and deletion policies. If you wish to terminate your access to the Website and request that we no longer use your information, contact us at customerservice@gearfirecapital.com and we will respond to you in a reasonable timeframe. We will retain and use your information as necessary to comply with any legal obligations, resolve disputes, and enforce our terms of service.

We will not discriminate against you for exercising any of your privacy rights.

Additional State Privacy Rights

To the extent that you are resident of a state with specific privacy rights and to the extent that COMPANY is subject to such state requirements, the following applies. Other state

consumer privacy laws may provide their residents with rights regarding our use of their personal information. For example:

Colorado, Connecticut, Indiana, Iowa Montana, Tennessee, Texas, Utah, and Virginia, may provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, Indiana, Montana, Tennessee, Texas, and Virginia also may provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please (i) email us at customerservice@gearfirecapital.com; or (ii) call us at 833-341-2378. Only you or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. Your request to know or delete must (1) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative; and (2) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Changes; Questions

We may, in our sole discretion, change this Policy from time to time without notice to you by posting a revised version at our Website. When we do so, changes will be effective immediately. Please review the Website periodically for changes. If you have any questions about this Policy, you may contact COMPANY at 833-341-2378 or via email at customerservice@gearfirecapital.com.

Effective Date: 9/1/23

Last Updated: 9/1/23

Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in COMPANY's Policy above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"), to the extent provided herein. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice. This Privacy Notice for California Residents only covers information our Website collects and applies if we are subject to the CCPA.

Information We Collect

Our Website may collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the scope of applicable state data privacy and protection laws, like personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

In particular, our Website has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	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.	NO
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual	NO

	orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website. From service providers or third parties. For example, from the merchant fulfilling your order to purchase a product or service.

Use of Personal Information

COMPANY may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.

- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure any account we assist you establish with any third-party lenders.
- To contact you and provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business, including to detect, prevent, and mitigate fraudulent or illegal activities.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To comply with a court order, law, or legal process, including to respond to any government or regulatory request.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

COMPANY may also use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sale, divestiture, restructuring, dissolution, assignment or other disposal of all or part of COMPANY or our business or assets (including your loan or lease and any agreement to which it relates), for the purposes of evaluating and/or performing the proposed transaction.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We do not sell personal information other than, to the extent we entered into a transaction with a debt collection agency to collect unpaid debts. We share your personal information with the following categories of third parties:

- Service providers.
- Data aggregators.

In the preceding twelve (12) months, COMPANY has disclosed personal information for a business purpose. In the preceding twelve (12) months, COMPANY has not sold personal information.

Your Rights and Choices

The CCPA may provide consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You may have the right to request that we disclose certain information to you about our collection, use, and disclosure of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Correct Inaccurate Information

You have the right to request that we correct inaccurate information that we collect about you.

Your Right to Limit our Use and Disclosure of Sensitive Personal Information

You have the right to request that we limit our use and disclosure of sensitive personal information.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request by (i) emailing us at customerservice@gearfirecapital.com; or (ii) calling us at 833-341-2378.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt by mail. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. 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.

Personal Information Sales Opt-Out

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age. To exercise the right to opt-out, you (or your authorized representative) may submit a request by (i) emailing us at customerservice@gearfirecapital.com; or (ii) calling us at 833-341-2378.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you goods or services, charge you different prices or rates, or provide you a different level or quality of goods or services.

Changes to this Privacy Notice for California Residents

The Effective Date of our Policy is set forth above this Privacy Notice for California Residents. We may, in our sole discretion, change this Privacy Notice for California Residents from time to time without notice to you by posting a revised version on our Website. When we do so, changes in the Privacy Notice for California Residents will be effective immediately. Your continued use of the Website and our services after the Effective Date constitutes your acceptance of the amended Privacy Notice for California Residents. Please review the Website periodically for changes.