Consumer Notice at Collection and Privacy Policy for California Residents

Effective Date: February 25, 2026

CreditFresh is not a bank. Credit applications submitted on CreditFresh.com may be originated and funded by one of our bank lending partners ("**Bank Lending Partner(s)**").

1. SCOPE OF THE CALIFORNIA PRIVACY NOTICE

This Consumer Notice at Collection and Privacy Policy for California Residents ("California Privacy Notice") applies to California residents only and explains how CreditFresh, including any affiliate, assigns, contractor, subcontractor or related third party thereof ("**CreditFresh**", "**we**", "**our**", or "**us**"), collects, uses, retains, discloses and protects applicable personal information about California residents (the "**California Privacy Notice**").

Personal information we collect, process, or maintain in connection with your credit application or Line of Credit account that is subject to the Gramm-Leach-Bliley Act (the "*GLBA*"), and its implementing regulations, is governed by the GLBA privacy notices provided by CreditFresh and the applicable Bank Lending Partner(s), and is not subject to the rights described in this California Privacy Notice.

For certain personal information, we are subject to the *California Consumer Privacy Act*, as amended by the *California Privacy Rights Act of 2020* (together, the "***CCPA***"), which requires that we provide California residents with a privacy notice that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing and retention of personal information and of the rights of California residents regarding their personal information ("**Covered Personal Information**").

2. INFORMATION WE COLLECT

AS THE INFORMATION SUBJECT TO THE *GLBA* IS EXEMPT FROM THE *CCPA*, THE CALIFORNIA PRIVACY NOTICE APPLIES TO LIMITED INFORMATION COLLECTED WHEN INTERACTING WITH OUR WEBSITES OR CUSTOMER SERVICE CHANNELS.

Covered Personal Information we collect:

- Internet or other electronic network activity information: including cookies, device identifiers, marketing interactions, and browsing history on our sites that is not subject to the *GLBA*;
- Geolocation (approximate): based on Internet Protocol address that is not subject to the *GLBA*;
- Inferences: product preferences, site experience;
- Identifiers: such as a real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers that are not subject to the *GLBA*;
- Sensitive Personal Information: such as government-issued identification numbers (SSN), financial information (payment method information), not subject to the *GLBA;* and
- Customer record personal information: such as address, telephone number, that are not subject to the *GLBA*.

3. SOURCES OF PERSONAL INFORMATION

We collect personal information from you directly and from website analytics tools.

4. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information to provide you with services, communicate with you, market to you, and for our website and analytics tools, which operate and improve our websites and services, measure site performance, non-targeted marketing and user experience optimization.

5. HOW WE SHARE PERSONAL INFORMATION

We may share Covered Personal Information, including all categories of Covered Personal Information identified above, with:

- With the applicable Bank Lending Partner;
- With service providers and vendors who support servicing operations (e.g. cloud providers, fraud vendors);
- With regulators and law enforcement, for their purposes, where required;
- With advertising/analytics vendors to understand consumer preference and activity.

When we share Covered Personal Information with our service providers, contractors, and vendors (including cloud providers, fraud vendors, and advertising/analytics vendors), **we do so under contracts that:**

- Permit them to use the Covered Personal Information **only** to provide services to us and for the business purposes we specify;
- Prohibit them from **selling** the personal information or using it for purposes in violation of applicable laws; and
- Require them to implement appropriate **privacy and security** protections.

We do not:

- Sell Covered Personal Information;
- Share Covered Personal Information for cross-context behavioral advertising.

We have no actual knowledge that we sell or share Covered Personal Information on consumers under 16 years of age.

6. YOUR RIGHTS UNDER CALIFORNIA LAW

California residents have the following rights with respect to non-*GLBA* personal information. If you are a resident of California, you may:

- **Request to Know** the categories or specific pieces of Covered Personal Information we collect, use, and disclose;
- **Request to Delete** Covered Personal information, subject to exceptions;
- **Right to Correct** inaccurate Covered Personal Information;
- **Opt-Out of Sale/Sharing** (not applicable as we do not sell/share Covered Personal Information);
- **Limit Use of Covered (Sensitive) Personal Information** (not applicable as we do not use it for non-essential purposes).

To exercise your rights, you can submit a verifiable consumer request to us by email at privacy@creditfresh.com or by calling us at 1-800-766-2007. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include provision of information such as name, email address, mailing address, telephone number, account information or anything else that allows us to verify your identify with information we currently hold. We will verify requests using a reasonable verification process, which may include consulting our records or third party data sources.

You can authorize another person to make a verifiable request on your behalf, but you must provide that person with signed permission clearly describing their authority to make a request on your behalf. That person must provide proof of the signed permission, and we may still verify your identity directly.

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 that relates to you.

Non-Discrimination: We will not discriminate against you for exercising any of your rights under the *CCPA*. This includes, as applicable, not denying you services, not charging you different prices or rates, not providing a different level or quality of services, and not suggesting that you may receive a different price, rate, level, or quality of services for exercising your rights.

7. SECURITY

We maintain administrative, technical, and physical safeguards consistent with the *CCPA* to protect your Covered Personal Information from unauthorized access, use or disclosure. These measures include encryption, access controls, monitoring, and secure software development practices.

8. RETENTION OF COVERED PERSONAL INFORMATION

We retain Covered Personal Information only as long as necessary to fulfill the purposes described above and comply with legal and regulatory obligations.

We retain Covered Personal Information only as long as reasonably necessary to achieve the purposes described in this California Privacy Notice or as required by law and regulation. In determining how long to retain Covered Personal Information, we consider:

- The **type of Covered Personal Information** and the category (e.g., website/online activity, marketing information);
- The **nature of our relationship** with you;
- The **purposes** for which we collected and used the information; and
- Our **legal and regulatory obligations**, including recordkeeping requirements.

9. CHANGES TO THIS CALIFORNIA PRIVACY NOTICE

We may update this California Privacy Notice from time to time. When we do, we will revise the “Effective Date” at the top of this California Privacy Notice and post the updated version on our website.

10. INTERACTION WITH WEBSITE TERMS OF USE

The California Privacy Notice works together with our Website Terms of Use, which governs your use of our website, including permitted conduct, intellectual property restrictions, disclaimers, and limitations of liability.

11. CONTACT US

If you have questions about this California Privacy Notice, you can reach us by:

Email: privacy@creditfresh.com

Toll-Free Phone Number: 1-800-766-2007

Mailing Address: CreditFresh, 200 Continental Drive, Suite 401, Newark, DE 19613, USA