

PRIVACY POLICY

Last updated: October 31, 2017

1. General Information

Fundation Group LLC ("us", "we", or "our") owns and operates the website www.fundation.com. We respect and are committed to protecting your privacy. This privacy policy (the "Privacy Policy") describes our policies regarding the collection, use and disclosure of Personal Information we receive from users of www.fundation.com, any other website from which you access the Privacy Policy (collectively, the "Site"), and otherwise. Personal Information is information that personally identifies you, which may include your contact information, IP address, and information you provide on your loan application. We use your Personal Information to provide you services and to improve the Site. By using the Site and applying for any of our services either on the Site or linking from a third party website, you consent to this policy, including your consent to the collection, disclosure and use of information in accordance with this Privacy Policy and as permitted under applicable law.

In accordance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly request, collect, or utilize any information from children under the age of thirteen or any persons under the age of eighteen. The Site is intended as a general audience website.

2. Information Collection and Use

While using our Site, we collect and may ask you to provide us with certain personally identifiable information that can be used to contact you, identify you, and provide our services. The information we collect may include, but not be limited to, the following public and nonpublic information (collectively, "Personal Information"):

- Contact information, including name, address, phone number and email address;
- Business information, including financial statements, bank statements, tax returns and taxpayer identification number, to help us assess your eligibility for a loan;
- Banking information such as account balances and payment history, so we can fund your loan and receive payments;
- Social security number;
- Site registration and login information;
- Credit history and/or credit scores;
- Other information that enables us to identify you, determine your eligibility for a loan and provide services, such as non-demographic data and data regarding your use of the Site that does not identify you; and
- Information you may provide to us about other persons such as business partners, loan co-signers or co-borrowers.

We collect Personal Information from you when visiting the Site to assist us in providing you information in connection with your inquiry about our services. The information we collect from you may vary depending upon what information regarding specific products or services you are requesting. We may also collect Personal Information to process credit applications, such as credit and background reports, from third party service providers.

3. Use of Personal Information

Personal Information is used in the course of our everyday business. We collect your Personal Information, for example, when a credit application is submitted to us. We use your Personal Information to verify your identity as required under the Bank Secrecy Act and other federal law, to determine whether you qualify for credit, to process your credit application, service your loan or line of credit and contact you by phone, email or text message to manage your customer relationship and provide you with customer support. We may also use your Personal Information to measure the overall effectiveness of our online advertising, content, services and other products, as applicable.

We may share your Personal Information with our third party service providers and business partners to provide loan or credit services to you, such as customer service and payment processing, and to verify our compliance with applicable laws. We may also disclose your Personal Information:

- In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency;
- To establish or exercise our legal rights; to defend our legal rights; to defend against legal claims; or as otherwise required by law;
- When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; or to enforce our Site's terms and conditions or other agreements or policies;
- If we sell or assign your loan or line of credit, or any part thereof, to one of our affiliates or business partners or are otherwise contractually required to share such information with our business partners;
- In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, asset sale or in the unlikely event of a bankruptcy;
- For marketing purposes or joint marketing with other companies to offer products and services to you; and
- In connection with state and/or federal licensing requirements.

4. Log Data

Like many website operators, we make use of standard internet technologies to collect information that your browser sends whenever you visit our Site or perform any activity on our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

5. Cookies

We use "cookies" on this Site. A cookie is a small text file that is stored on a site visitor's hard drive to help us improve your access to our Site and identify repeat visitors. When you visit the Site, we may assign your computer one or more cookies to facilitate access to the Site and record information about your visit. Cookies can also enable us to track and target the interests of our users to enhance the experience on our Site. Usage of a cookie is in no way linked to any personally

identifiable information on our Site and cookies do not store any Personal Information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you choose to decline cookies, please note that some of the features and services of our Site may not function properly and you may not be able to use some portions of the Site.

Some of the cookies we use on our Site are for Google Analytics. Google Analytics is a web analytics tool that helps us understand how visitors engage with the Site so that we can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our Site. For more information on opting out, visit <https://tools.google.com/dlpage/gaoptout>.

6. Security

The security of your Personal Information is important to us and we take reasonable measures to help safeguard it. To protect your Personal Information from unauthorized access and use, we use security measures that comply with federal law. Your Personal Information is protected by our Secure Sockets Layer (SSL) software, which encrypts all of your information so that it cannot be read over the Internet.

The security of your Personal Information is important to us, but no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

7. Changes to This Privacy Policy

Fundation may update or modify this Privacy Policy from time to time to reflect changes to how we will collect, use and/or share information. Our policy will reflect the date it was last updated. If any material change is made to this privacy policy we will notify you of any changes by posting the new Privacy Policy on the Site. You are advised to review this Privacy Policy periodically for any changes. Your continued use of the Site will signify your acceptance of the changes to the Privacy Policy.

8. Visiting the Site From Outside the United States

This Privacy Policy is intended to cover collection of information on our Site from users located within the United States. If you are visiting the Site from outside the United States, please be aware that your information may be transferred, stored and processed in the United States.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us at:

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