Prestige Financial Services, Inc.'s Privacy and Data Policy

General Privacy Statement

This Privacy Statement explains how Prestige Financial Services, Inc. (hereinafter Prestige) and its controlled affiliates collect, use and disclose Personal Information. We respect your privacy and the confidential nature of the information that we gather during the course of our relationship with you. By using this site, you consent to this Privacy Policy and any future amendments and additions. If

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CFIPA), and the Driver's Privacy Protection Act of 1994.

How We Collect Information and Data

We may collect information as follows:

Directly from you. For example, from forms you complete, your account history, or products or services for which you apply. This applies to the following categories: identifiers; California Customer Records personal information categories; commercial information; professional or employment related information.

From affiliates, dealers and other business partners. For example, credit applications, retail installment contracts, third-party servicing agreements, and other forms you complete with such entities. This applies to the following categories: identifiers; California Customer Records personal information categories; commercial information; internet or other similar network activity; geolocation data; audio, visual, electronic, or similar information; professional or employment related information; educational information that is not publicly available; inferences drawn from other personal information.

From our websites. This applies to the following categories: identifiers; commercial information; internet or other similar network activity; geolocation data; professional or employment related information;

How We Use Information

The information that Prestige collects from and about you is used to increase your service and experience with us and on our websites. We may use your information:

- To process and respond to your inquiries and requests;
- To create, maintain, customize, service, and secure your account with us;
- To inform you about important information regarding your account, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies, and/or other administrative information;
- To personalize your experience with us;
- To help maintain the safety, security, and integrity of your account, and our products and services, databases and other technology assets, and business;
- To allow you to apply for services and evaluate your eligibility for such services;
- To verify your identity and/or location in order to allow access to your account, conduct online transactions and payments, and to maintain measures aimed at preventing fraud and protecting the security of account and personal information:
- For business purposes, including data analytics, audits, developing and improving products and services, enhancing websites, and identifying usage trends;
- For risk control and management, for fraud detection and prevention;

- To allow you to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- To comply with applicable legal requirements.

Disclosure of Information

To see how Prestige may share Personal Information and how you may be able to limit certain types of sharing, please see our <u>Privacy Notice</u>.

Disclosure of Personal Information to Third-Party Service Providers

Prestige may disclose your personal information to a service provider for a business purpose. A business purpose may include:

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- 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 the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

We use third party service providers to process personal information on our behalf. These may include the provision of customer support, web hosting providers, account recovery and servicing providers, customer data management and list enhancement companies, companies that fill product orders or coordinate mailings, delivery companies, payment processors, data analysis firms and email service providers. We seek to use service providers who are able to provide appropriate data privacy and security standards.

In the preceding twelve (12) months, Prestige has disclosed the following categories of Personal Information for a business purpose:

- Identifiers
- California Customer Records personal information categories.
- Commercial information.
- Internet or other similar network activity.

- Geolocation data.
- Audio, visual, electronic, or similar information.
- Professional or employment related information.
- Educational information that is not publicly available.
- Inferences drawn from other personal information.

Sales of Personal Information

In the past 12 months, Prestige has not "sold" Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, "sold" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Cookies Policy and Statement

Like many websites, Prestige utilizes "cookies" to maintain a record of your visit to the websites and your use of the services. A cookie is a small text file that is transferred by a web server and stored on the hard drive of your computer or mobile device. It can only be read by the server that sent it to you.

Cookies help Prestige improve its services, and to deliver more personalized service by enabling Prestige to estimate audience size and usage patterns; to store information about your preferences; to speed up your searches and to recognize you when you return to the Sites or use the Services.

Most web browsers automatically accept cookies. If you would prefer to prevent your computer from accepting Prestige's cookies, you may follow your Internet browser's steps for doing so. Please note, however, that if you do disable cookies from your browser, you may not be able to access certain sections of Prestige's websites and services.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Website.

California Residents: Your Rights and Choices under the California Consumer Protection Act

For California Residents, the California Consumer Protection Act (CCPA) provides consumers with specific rights regarding their Personal Information as defined by the act. This section describes your CCPA rights and how to exercise those rights. Prestige is a financial institution regulated by the Gramm Leach-Bliley Act (see 15 USC 6801-6809) as well as other state and federal privacy regulations which may impact your rights under the CCPA.

You have a right to notice, at or before the point of collection, the categories of personal information to be collected and the purposes for which the categories of personal information shall be used.

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS – CALIFORNIA CONSUMERS

You have the right to request that Prestige disclose certain information to you about our collection, use, disclosure, and sale of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request Prestige 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.

To exercise the access and data portability rights described above, please submit a verifiable consumer request to us by contacting us at:

https://privacyportal-cdn.onetrust.com/dsarwebform/d4a0994f-b8c5-4582-88f8-1bf98c039609/d6cca444-f2c0-40a2-8408-0d03f8e2191b.html or 888-822-7422

Only you, or a person 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 make a verifiable consumer request for access or data portability twice within a 12-month period. 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; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

DELETION REQUEST RIGHTS - CALIFORNIA CONSUMERS

You have the right to request that Prestige delete any of your personal information that we collected from you or maintained, 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, 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.

To exercise the deletion request rights described above, please submit a verifiable consumer request to us by contacting us at:

https://privacyportal-cdn.onetrust.com/dsarwebform/d4a0994f-b8c5-4582-88f8-1bf98c039609/46276f5f-5c2d-47c1-af3a-efadeff529ea.html or 888-822-7422

Only you, or a person 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.

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; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

RESPONSE TIMING

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the need for an extension period.

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 provide your personal information in a format that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance either in writing, electronically, or through your account.

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.

NON-DISCRIMINATION – CALIFORNIA CONSUMERS

You have the right not to receive discriminatory treatment by Prestige for the exercise of any of the privacy rights conferred by the CCPA. 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 for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

CONTACT INFORMATION

If you have any questions or comments about your choices and rights regarding the use of your Personal Information under California law, please do not hesitate to contact us at:

Privacy@gopfs.com

888-822-7422

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