

Effective Date: 01/21/2022

CENTENNIAL LENDING ONLINE PRIVACY STATEMENT

Online Privacy Statement

This Online Privacy Statement (“Privacy Statement”) describes Centennial lending, LLC’s (“Centennial”) online and mobile privacy practices and applies to websites, mobile applications that run on smartphones, tablets, and other devices (“apps”), and additional services that we offer which link to this Privacy Statement.

Information you provided Centennial when you applied for or obtained a product or service from us is also governed by a separate notice entitled Privacy Policy at the top of this document. If you are such an applicant or customer, please refer to that notice for additional information about our privacy practices.

Please read this Privacy Statement carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using the website, you agree to this Privacy Statement. This Privacy Statement may change from time to time. Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check the Privacy Statement periodically for updates.

Information We Collect – and How We Collect It

Our websites and apps are not intended to be used by children. We do not intentionally collect personal information from children under 13 without permission from their parent or legal guardians. For more information about the Children's Online Privacy Protection Act (COPPA), please refer to the FTC's website at <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children's-privacy>.

When you use our website or our apps, we may collect Personal Information that you submit to us voluntarily, or Online Activity Data that we collect passively.

Personal Information is information such as your name, mailing address, email address, telephone number, Social Security number, or other information that identifies you. This information may be collected when you voluntarily provide it to us on our website or in our apps.

Online Activity Data includes information such as your IP address, browser type, and display/screen settings; how you interact with our website and apps; mobile device and advertising IDs; social media preferences and other social media data; and other data that may be aggregated and that does not identify individual consumers/customers. This data may be collected using cookies and other online tracking devices such as web beacons, depending on your browser settings. Cookies are small pieces of data sent from a website and stored on your computer by your web browser that can allow other websites that you visit to track your browsing activities. A web beacon is a small string of HTML code that represents a graphic image on a website or email.

Centennial may also partner with third parties to monitor activities on our own website and other websites. These partners may use cookies, web beacons, and/or other monitoring technologies to compile statistics about website visitors. Additionally, Centennial may collect Online Activity Data when you use our apps or your mobile device browser to access our website, i.e. geolocation data (if you have enabled location services on your device). Centennial may also collect Online Activity Data or information such as your likes, interests, feedback, and preferences when you interact with our official pages on social media websites such as Meta, Twitter, LinkedIn, and YouTube or from our social media partners (but only if you choose to share with them and they, in turn, share that information with us). Please refer to the policies of those companies to better understand your rights and obligations with regard to your activity on those websites.

How We Use Information

We may use Personal Information and Online Activity Data we have collected for a variety of reasons, including:

- to present our website and its contents to you.
- to enable you to use online tools or perform certain online transactions.
- to service and manage your account, including responding to or updating you on inquiries, or to contact you about your accounts or feedback.
- to offer you special products and services and deliver advertisements to you in the form of banner ads, interstitial pages (ads that appear as you sign in or sign out of your online accounts) or other promotions.
- to analyze whether our ads, promotions, and offers are effective.
- to help us determine whether you might be interested in new products or services, and to improve existing products and services.
- to verify your identity and/or location to allow access to your accounts and conduct online transactions.
- to manage fraud and data security risk.
- to personalize and optimize your website browsing and app experiences by examining which parts of our website you visit or which aspect of our apps you find most useful.
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements.
- to share with trusted third parties who are contractually obligated to keep such information confidential; and
- to use it only to provide the services we have asked them to perform. For a description of how Centennial may share information collected from consumers who have applied for or obtained a consumer product or service from us, please refer to the Privacy Policy.

Who We Share Your Information With

We disclose your Personal Information and Online Activity Data to third parties for our business purposes. The general categories of third parties that we share with are as follows:

- Our third-party service providers.
- Other companies to bring you co-branded services, products or programs.

- Third parties that help us advertise our products or services.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our company or affiliated business.
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise, to protect the rights, property or security of our customers or third parties.

Use of Cookies and Similar Tracking Technologies

This part of our Privacy Statement explains how Centennial may use cookies and similar tracking technologies when you interact with us online or through our websites and mobile applications (“sites and mobile apps”).

Introduction

The use of cookies and similar tracking technologies (including pixels or clear GIFs, tags, web beacons and Flash objects) is a common internet practice. Cookies are text files containing small amounts of information which are downloaded to your computer, smartphone, tablet or other mobile device when you visit a website. Tracking technologies may collect information about you and your use of sites and mobile apps. We have developed this policy to provide general information on cookies and similar tracking technologies which we will refer to as “cookies.”

Cookies are useful in a number of ways, including allowing a site or mobile app you use to recognize your device, keep track of pages visited and even remember your preferences. This information is used for security purposes, to facilitate navigation, to display information more effectively and to personalize the user’s experience. Cookies and similar tracking technologies are also used to gather statistical information about how sites and mobile apps are used in order to continually improve design and functionality and assist with resolving questions regarding the sites and mobile apps.

Attributes of Cookies

Cookies set by us are called **first-party cookies**. We may also have **third-party cookies**, which are set by partners who have contracts with us. Third-party cookie information can only be used for the purposes for which we have stated in the contract. There can be first-party and/or third-party cookies within any of the below Categories of Cookies.

Cookies have a duration period. Cookies that expire at the end of a browser session are called “session” cookies. Cookies that are stored longer are called “persistent” cookies. There can be session and/or persistent cookies within any of the below Categories of Cookies except for Geolocation Cookies which are only session cookies.

Categories of Cookies

Below is a list of the types of cookies that may be used in our sites and mobile apps. We classify cookies into the following categories:

Strictly Necessary Cookies. These cookies are necessary for the sites and mobile apps to function and cannot be switched off in our systems. Without these cookies, the sites and mobile apps will not work properly. Examples include setting your privacy preferences, setting your language preferences or logging in a secured area requiring authentication. Strictly necessary cookies may also detect transmission errors or data loss or distribute network traffic across different servers to ensure accessibility.

Performance Cookies Performance. cookies enable us to measure and improve the performance of our sites and mobile apps. These cookies collect information about how visitors use a site and mobile app, for instance, which pages visitors go to most often and if they get error messages. These cookies can also be used to make collective inferences based on choices and browsing behavior for marketing research.

Advertising Cookies Advertising. cookies are used to deliver advertisements that may be relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They are usually placed through our sites and mobile apps by our advertising partners and remember that you have visited a site or mobile app. This information may be shared with other organizations such as advertisers.

Geolocation Cookies. Geolocation cookies allow us to determine your location in order to provide you with information you request, such as the location of the nearest office. Consent for these cookies is requested at the time of the request, and the information is not retained after the session ends.

Managing Your Online and Mobile Preferences

As you access our sites and mobile apps, cookies and similar technologies allow us to customize content and advertisements for our products and services on our websites or apps. Using cookies can give you additional or easier access to certain features on our website (such as allowing you to sign in easier) and can allow us to provide you with more personalized offers. Currently, the standards regarding “do not track” (DNT) signals and appropriate responses are not defined. As a result, our website does not respond to browser DNT signals. You can set your browser to not accept cookies or to indicate when cookies are sent.

Some mobile devices come with a non-permanent advertising identifier or ID which gives companies the ability to serve targeted ads to a specific mobile device. In many cases, you can turn off mobile device ad tracking or you can reset the advertising identifier at any time within your mobile device privacy settings. You may also choose to turn off location tracking on your mobile device. By turning off ad tracking or location tracking on your mobile device, you may still see the same number of ads as before, but they may be less relevant because they will not be based on your interests.

Behavioral Advertising on Third Party Websites

Currently, Centennial does not use unique cookies to collect Online Activity Data on our website or apps to advertise on third party websites Centennial products and services that may be of interest to you. Our service providers are subject to their own privacy policies. To explore options for opting out of behavioral advertising, visit <http://optout.aboutads.info/> or click on the AdChoices icon in an ad and follow the instructions. You may also use the Network Advertising Initiative's (NAI) Opt-Out Tool by visiting <https://optout.networkadvertising.org/?c=1>. Furthermore, you may download the Google Analytics opt-out plug in, available at <https://tools.google.com/dlpage/gaoptout/>, to prevent your data from being collected and used by Google Analytics. Moreover, there may be other tools provided by the publishing platform to enable you to opt-out. Opting out relies on information in the unique cookies placed on your web browser by our service providers, so if you delete cookies, use a different device, or change web browsers, you may need to opt out again. Additionally, we may partner with websites like Google and Yahoo to display ads to you based on search terms you use on those websites. Please review the privacy policies of those websites for instructions on how to limit these ads. Please note that you may still receive general online advertising from Centennial even after you adjust your ad preferences with certain web search engines or opt out of online advertising through AdChoices or the NAI tool. Such advertising, however, should not be based on Online Activity Data or search term information.

However, since we do not own or control these third-party resources, we cannot ensure that you will stop receiving our advertisements by using these tools or that such advertisements will not be based on Online Activity Data or search term information, and we do not guaranty the functionality or availability of such third-party tools. While Centennial works with vendors and service providers who are contractually obligated to comply with our policies to protect information and to comply with all applicable laws regarding the collection, safeguarding, processing and disclosure of personal information, such vendors and service providers are solely responsible for cookies, cookie tracking and your choices for managing cookies.

Updating or Correcting Your Information

Keeping your account information up to date is important. You may review, correct, or update certain account information by signing into your account online. Note that this right to correct information includes the right to request changes to any of your personally identifiable information that we have collected through our website and online services. If you cannot update or change the incorrect information online, or you prefer to request changes offline, please see the Customer Service section on our website, or call **(866) 588-1100** or write to us using the contact information listed on your account statements, records, or other account materials.

Links

Our websites may include links to third-party websites. These third parties are not subject to this Privacy Statement or to the Privacy Policy. Please review their privacy notices when visiting these websites.

Information Security

At Centennial, we are committed to protecting your personal and financial information. If we collect identifying information from you, we will protect that information with appropriate physical, electronic, and procedural safeguards to protect and limit access to personal information. Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

Changes to this Privacy Statement

Centennial reserves the right to amend or change its online privacy practices in the future and we may revise this Privacy Statement at our discretion and at any time. Changes to this Privacy Statement will be posted to our website.

Glossary

AdChoices: Allows individuals to opt out of browser-enabled interest-based advertising by some or all participating companies, using opt-out cookies to store your preferences in your browser.

Browser: An application used for accessing websites or information on a computer network. Examples include Chrome, Safari, Edge, Internet Explorer, and Firefox.

Business partners: Companies we partner with to jointly market and/or deliver products and services to you. Business partners include affinity or co-brand business partners. They may not use this information to independently market to you unless you consent.

Privacy Policy: A Centennial product-specific privacy notice, which we provide to customers at account opening and annually thereafter pursuant to federal law. It describes our privacy practices and provides you the right to opt out of certain types of information sharing.

IP address: A unique "Internet Protocol" number assigned to a device connected to the Internet. Centennial treats IP addresses as non-personal information unless otherwise required by law.

Operating system: Software that controls the operation of a computer and directs the processing of programs, such as Microsoft Windows or macOS.

Service providers: Vendors with whom we have a contractual relationship to perform services on our behalf.

Session: The time from when a customer is signed into a website or app to when the customer is signed out.

Social media: Websites and apps that enable users to create and share content or to participate in

social networking, such as Meta, Twitter, LinkedIn, and YouTube.

Third-party websites: Sites that are not owned or operated by Centennial and are not subject to our Privacy Statement.

Web beacon (alternatively referred to as a tracking bug, tag, page tag, tracking pixel, pixel tag, or clear gif): An often-transparent graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a website or in an email that is used to monitor the behavior of the user visiting the website or interacting with the email. Web beacons can be used for activities like site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization.