

Privacy policy

April 5, 2021

Introduction. This Privacy Policy ("**Policy**") is stating the details relating to personally identifiable information **BorrowLabs** (the term "BorrowLabs" in this Policy refers to the group of companies, including BORROW LABS LLC, a legal entity incorporated under the law of California (USA) and CREDEO FINANCE INC, a legal entity incorporated under the laws of the Commonwealth of Virginia (USA), whether together or separately), collects and uses and to the User's rights hereunder.

This Privacy Policy applies to: all means of access to BorrowLabs' website <https://borrowlabs.com>, including all subdomains (collectively, the "**Website**") and/or the use of BorrowLabs' services or any other features, technologies or functionalities, websites, software and copyright assets and other services which BorrowLabs have or have licensed to Users and/or which are offered by BorrowLabs through the Website or any other means (collectively, the "**Services**"). This Policy should be considered an integral part of, and should be read together with BorrowLabs Terms of Service located at <https://borrowlabs.com/terms> (the "**Terms**").

Should the User have any questions about our processing of personal data or about this Privacy Policy, please refer to the last section of the document for information on how to get in touch with us.

The term "**Personal Data**" in this Policy refers to personally identifiable information the User provides when using the Website and/or the Services and/or the User Content and/or in any other contact with BorrowLabs, its affiliates and their shareholders, members, directors, officers, employees, agents, vendors, content providers, and representatives, except for any anonymized Personal Data. The term "**Affiliated Parties**" in this Policy refers to BorrowLabs' partners, affiliated companies and third parties.

PLEASE READ THIS POLICY BEFORE USING BORROWLABS' WEBSITE AND/OR THE SERVICES. IF YOU DO NOT AGREE WITH THIS POLICY AND TERMS, PLEASE DO NOT USE THE WEBSITE AND/OR THE SERVICES.

What personal data does BorrowLabs collect? BorrowLabs collects and processes the following types of the User's personal data:

- a. Identification Data, such as the User's name, date of birth, present and former addresses (street address, postal code, city, country, etc.), social security number, etc.;
- b. Contact Data, such as the Users' phone number(s), mailing address, and email address;
- c. Loan Data, including but not limited to, marital status, education, number and ages of dependents, number of years residing at present and former addresses as well as the type of occupancy (own or rent), professional and business experience, employment, income, and asset information, credit score, information on outstanding judgements, bankruptcies, foreclosures, titles or deeds in lieu thereof, lawsuits, liabilities, delinquencies or defaults on liabilities, status of co-maker or endorser on a note, citizenship, residency, intention to occupy properties, etc.;
- d. Data for government monitoring purposes is collected at the request of the Federal Government in order to monitor the lenders' compliance with equal credit opportunity, fair housing and home mortgage disclosure laws (you are not required but are encouraged to furnish this information), such as race, ethnicity, and sex;
- e. Verification Data, including but not limited to, employment history and income, bank, money market, and similar account balances and history, credit history, copies of income tax returns, and background checks, including the information on criminal records;
- f. Financial Data such as the Users' payment card details and billing address;
- g. Transaction Data such as the details about Users' actions on or relating to the Website and/or the Services and payments between Users and/or between the User and BorrowLabs and any other details about actions relating to the Website and/or the Services made by User;
- h. Technical Data such as Users' login data, internet protocol addresses, browser types and versions, operating systems and platforms and other technologies on the devices Users use to access the Website and/or the Services;
- i. Profile Data such as Users' usernames and passwords, purchases and orders, Users' interests, preferences, feedback and survey responses;
- j. Usage Data such as the information about how User uses the Website and/or the Services; and
- k. Marketing and communications Data such as the User's preferences in receiving marketing communications from BorrowLabs and User's communication preferences.

BorrowLabs does not collect any sensitive data about Users that includes details about their religious or philosophical beliefs, sex life, sexual orientation, political

opinions, trade union membership, information about Users' health and genetic and biometric data.

BorrowLabs only collects personal data that it deems to be reasonably necessary to fulfill Users' requests and BorrowLabs' legitimate business objectives.

Personal data does not include any publicly available information from government records and de-identified or aggregated consumer information.

How does BorrowLabs collect Users' personal data? BorrowLabs collects Users' Personal Data by way of direct interactions, automated technologies and/or interactions, and third-party requests.

Direct interactions. A User may provide data by filling in forms on the Website (or otherwise) or by communicating with BorrowLabs by email, built-in chat module, phone or otherwise, including when the User:

- a. Applies to, refers to and in any other manner interacts with the Website and/or the Services;
- b. Creates an account on the Website;
- c. Subscribes to BorrowLabs' publications;
- d. Requests resources or marketing information be sent to User; and
- e. Gives BorrowLabs feedback.

Automated technologies or interactions. As the User uses BorrowLabs' Website and/or the Services, BorrowLabs may automatically collect technical data about Users' equipment, browsing actions and usage patterns. BorrowLabs collects this data by using cookies, server logs and Google Analytics.

Third-party requests. As the User uses BorrowLabs' Website and/or the Services, BorrowLabs may, at User's specific consent, request the User's personal data from third parties, such as credit reporting agencies, banks, the User's employers, etc.

Correcting personal information. Users are required to review and update their personal information to ensure that it is correct. If any of the User's information is incorrect, please either correct it or contact BorrowLabs with the correction at help@borrowlabs.com.

How and why does BorrowLabs use Users' personal data? Set out below is the description of the ways BorrowLabs intends to use its Users' personal data and the legal grounds on which BorrowLabs will process such information. Where relevant, we also explain what our legitimate interests are.

The most common legal/lawful grounds for BorrowLabs processing of Users' personal data are:

- a. Where BorrowLabs needs to evaluate the User's application for a loan;

- b. Where BorrowLabs needs to enter into and/or perform a contract with User;
- c. Where it is necessary for our legitimate interests (or those of a third party) and the User's interests, provided, however, that these legitimate interests do not infringe on User's fundamental rights;
- d. Where BorrowLabs needs to comply with a legal or regulatory obligation.

BorrowLabs may process Users' personal data for more than one lawful ground, depending on the specific purpose for which BorrowLabs is using Users' data. Please email BorrowLabs at legal@borrowlabs.com, if You need details about the specific legal ground BorrowLabs is relying on to process Users' personal data where more than one ground has been set out in the table below:

Purpose / Activity	Type of Data	Lawful Basis for Processing
To register as a new User	Identification Data Contact Data	Evaluation of User's application for the loan Performance of a contract with User
To process User's activities on the Website and/or the Services (including application assessment, data verification, management of payments, fees and charges)	Identification Data Contact Data Financial Data Transaction Data Loan Data Verification Data	Evaluation of User's application for the loan Performance of a contract with User Application Assessment and Data Verification
To manage our business relationship with User which will include: Notifying User about changes to BorrowLabs' Terms or Policy or other materials Asking User to leave a review or take a survey To send User product and company updates	Identification Data Contact Data Profile Data Marketing and Communications Data	Performance of a contract with User Necessary to comply with a legal obligation, i.e. due to product liability, data protection legislation or accounting legislation. Necessary for our legitimate interests to keep our records updated and to study how Users use BorrowLabs' products/services

To enable User to partake in a prize draw, competition or complete a survey	Identification Data Contact Data Profile Data Usage Data Marketing and Communications Data	Performance of a contract with User Necessary for our legitimate interests to study how Users use our products/services, to develop them and grow our business Based on consent from User
To administer and protect BorrowLabs' business, Website, Services, intellectual property and any kind of licensed assets (including troubleshooting, testing, system maintenance, support, reporting and hosting of data)	Identification Data Contact Data Technical Data	Performance of a contract with User
To use data analytics to improve or develop BorrowLabs' business, Website, Services, intellectual property and any kind of licensed assets, marketing, User relationships and experiences	Technical Data Usage Data	Necessary for BorrowLabs' legitimate interests to define types of Users for BorrowLabs' experience and Services, to keep its Website updated and relevant, to develop its business and to inform its marketing strategy
To make suggestions and recommendations to User about BorrowLabs' different Services that may be of interest to User	Identification Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Necessary for BorrowLabs' legitimate interests to develop its Services and grow its business
To monitor the BorrowLabs'	Data for Government Monitoring Purposes	Necessary to comply with a regulatory obligation

compliance with equal credit opportunity, fair housing and home mortgage disclosure laws		
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Account Registration. When User signs up and creates account on the Website, BorrowLabs collects a email address and asks User to create a password. Once completed BorrowLabs assigns an Individual Account Number (IAN) to User. BorrowLabs uses this to maintain an account with User. When signing in for the first time, User will be prompted to provide name, date of birth, and phone number.

Account History. BorrowLabs maintains records of User account activity when User is logged in to his (her) account for security and operations purposes. Account activity includes the age of User’s account, BorrowLabs' Website browsing history, records of User’s transactions, and other information related to User’s activity while on the Website.

Marketing communications. User will receive marketing communications from BorrowLabs if User has:

- a. Requested information from BorrowLabs or got an access to Website and/or the Services; or
- b. If User provided BorrowLabs with User’s details and ticked the box at the point of entry of User’s details for BorrowLabs to send User marketing communications, e.g. when User got an access to Website and/or the Services, or when User registered for subscription; and
- c. In each case, User has not opted out of receiving that marketing.

BorrowLabs will get User’s express opt-in consent before BorrowLabs shares User’s personal data with any third party for their or other third party marketing purposes. Generally, BorrowLabs does not rely on consent as a legal ground for processing User’s personal data, other than in relation to sending marketing communications to User via email.

User has the right to withdraw consent to marketing at any time. User can ask BorrowLabs to stop sending User marketing messages by following the opt-out links on any marketing message sent to User or by emailing at help@borrowlabs.com.

Where User opts-out of receiving our marketing communications, this will not apply to personal data provided to BorrowLabs as a result of an access or use of

the Website and/or the Services or any other experience referring to and/or applying to the Website and/or the Services.

Change of purpose. BorrowLabs will only use User's personal data for the purposes for which BorrowLabs collected it, unless BorrowLabs reasonably considers that BorrowLabs needs to use it for another reason and that reason is compatible with the original purpose. If User wishes to find out more about how the processing for the new purpose is compatible with the original purpose, please email at legal@borrowlabs.com.

If BorrowLabs needs to use User's personal data for a purpose unrelated to the purpose for which BorrowLabs collected the data, BorrowLabs will notify User and BorrowLabs will explain the legal ground of processing.

BorrowLabs may process User's personal data without User's knowledge or consent where this is required or permitted by law.

Cookies and Logs. A cookie is information a website places on User's computer's hard drive so that the website is able to remember User's preferences and/or which pages User visited on the website and make User's visit more efficient and enjoyable.

BorrowLabs may use cookies to determine the number of unique visitors to Website over a given period, or to remember user account details, etc. so that the need for multiple log-ins is eliminated. BorrowLabs may combine information collected through cookies to any personal information submitted online when using the Website to help personalize User's access to and use of the Website and/or the Services. Cookies may be disabled on User's computer by indicating this in the preferences or options menus in User's browser.

BorrowLabs may collect data in the form of logs. Log data collected on web servers supplies BorrowLabs with aggregate information about the number of visits to different pages on the Website and other navigational data. The variety of technical information BorrowLabs may log is:

- a. IP address;
- b. Device information, including device name and IDs, hardware model, operating system and version, and mobile network information;
- c. Browser information;
- d. Cookie information;
- e. Date/time of access;
- f. Requested page(s);
- g. Referring page(s).

Pixel Data. Depending on User's interaction with Website and/or the Services, BorrowLabs may use (or have other use on our behalf) pixels, SDKs and other storage technologies, which operate similar to cookies, to collect or receive information from the BorrowLabs, Website and Services and apps to provide measurement services and target ads.

Information From Other Sources. As part of our due diligence process, BorrowLabs transmits and receives personal information about individuals to credit reporting agencies, banks, User's employers, and other third parties for the purposes of assessing User's suitability to use Website and/or the Services and to prevent fraud and identity theft. We also collect and share information about User for regulatory reporting purposes and fraud prevention, including Tax ID numbers, social security numbers, and Drivers' License numbers.

Users' Rights on the Collection, Use and Distribution of Personal Data.

Opt-In / Opt-Out. BorrowLabs allows User to monitor the way in which BorrowLabs uses the personal information BorrowLabs obtains. Any promotional materials which BorrowLabs may send to User (e.g. "newsletters" or "information bulletins") contain internal mechanisms that allow User to block future mailings (Opt-out).

Right to Access, Rectify, Modify, Erase and Object. User has the right to request access, rectification, or erasure of User's data that BorrowLabs has collected. Personal Data, that was used or is being used for evaluation of User's application for the loan, for performance of a contract with User, for application assessment and data verification purposes cannot be erased on User's demand (it shall be handled in accordance with the Governing Law).

User also has the right to object or restrict, for legitimate purposes, the processing of User's Personal Data, as well as the right to data portability. In case of restriction BorrowLabs may not be able to provide certain Services to User.

User may also withdraw User's consent on receiving marketing communications and on sharing User's data with BorrowLabs.

Users who wish to deactivate their account may do so in accordance with the Terms. Removed information may persist in backup copies for a reasonable period of time but will not be generally available to BorrowLabs and/or other third parties via the Website and/or the Services. The deactivation of an account and/or removal of the information and/or Personal Data, that was used or is being used for evaluation of User's application for the loan, for performance of a contract with User, for application assessment and data verification purposes is not allowed on User's demand (it shall be handled in accordance with the Governing Law).

Removed information is retained for Borrowlabs' own internal accounting purposes along with furnishing User requests for old actions relating Website and/or the Services.

User will not have to pay a fee to access User's Personal Data (or to exercise any of the other rights relating to User's Personal Data on Website and/or the Services). However, BorrowLabs may charge a reasonable fee if User's request is clearly unfounded, repetitive or excessive. Alternatively, BorrowLabs may refuse to comply with User's request in these circumstances.

BorrowLabs may need to request specific information from User to help BorrowLabs to confirm User's identity and ensure User's right to access User's personal data (or to exercise any of User's other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. BorrowLabs may also contact User to ask User for further information in relation to User's request to speed up its response.

BorrowLabs will try to respond to all legitimate requests within one month. Occasionally it may take longer than a month if User's request is particularly complex or User has made a number of requests. In this case, BorrowLabs will notify User and keep User updated.

If User wishes to exercise any of the rights set out above, please email help@borrowlabs.com.

Data Retention. BorrowLabs will only retain User's personal data for as long as necessary to fulfil the purposes BorrowLabs collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, BorrowLabs considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of User's personal data, the purposes for which BorrowLabs processes User's personal data and whether BorrowLabs can achieve those purposes through other means, and the applicable legal requirements.

By law BorrowLabs has to keep basic information about our Users (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being Users for accounting and tax purposes.

In some circumstances BorrowLabs may anonymize User's personal data (so that it can no longer be associated with User) for research or statistical purposes in which case BorrowLabs may use this information indefinitely without further notice to User.

Sharing and Disclosure of Personal Data. BorrowLabs does not sell Users' data to any third party for marketing purposes. As a general rule, BorrowLabs will not forward Users' Personal Data to third parties without Users' permission. However,

since BorrowLabs works in conjunction with partners, affiliated companies and third parties for the provisioning of our Services, BorrowLabs may have to share Users' personal data with them.

BorrowLabs may also disclose or share Users' data with:

- a. Service providers who provide IT and system administration services, data sourcing or verification services;
- b. Subsidiaries or other group companies;
- c. Affiliated Parties;
- d. Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- e. State authorities.

BorrowLabs only allows such third parties to process Users' personal data for specified purposes and in accordance with its instructions and applicable data protection law.

BorrowLabs works with trusted partners who perform certain key operational functions for it. The partners BorrowLabs works with include website hosting, marketing and transactional communications, customer service, product analysis, business intelligence, and electronic payment and signature providers. BorrowLabs may work with other service provider or third parties to undertake other functions such as account servicing. User information may be shared with these partners in order to maintain and develop the Website and/or provide Services. When BorrowLabs shares User personal information with vendors and service providers who perform functions on BorrowLabs' behalf, BorrowLabs requires the security and confidentiality of Users' information, as well as limiting their use of the information to reasonably and necessarily to carry out their work with BorrowLabs and comply with applicable laws and regulations. In case the User's loan is transferred/sold (or being discussed and reviewed for a possible transfer/sale) to the third party (investor), the User authorizes BorrowLabs to provide such third party (investor) with any and all information and documents that such third party (investor) may reasonably request. Such information includes, but is not limited to, employment history and income; bank, money market, and similar account balance; credit history; and copies of income tax returns.

Advertisers. BorrowLabs shares Users' personal information with third-party marketers who provide advertising on our behalf. In order to serve offers and advertisements that may be of interest to User, BorrowLabs displays targeted advertisements on the Services, or other digital properties or applications in conjunction with BorrowLabs content, based on information provided to BorrowLabs by Users and information provided to BorrowLabs by third parties that they have independently collected. These advertisers collect and use information gathered from cookies and other technology, including personal

information about User and Users devices, in order to provide advertisements about goods or services (including our own) that may be of interest to User. These companies typically use tracking technologies to collect this information—their use of such technologies is subject to their terms and privacy practices.

Legally Compelled Disclosures. BorrowLabs may disclose Users' Personal Data if required to do so by law or if BorrowLabs believes that such action is necessary to:

- a. conform to the law, comply with a judicial or court order or comply with legal process served on BorrowLabs or Affiliated Parties;
- b. protect and defend BorrowLabs' rights and property, the services, the users of the services, and/or our Affiliated Parties;
- c. act under circumstances to protect the safety of Users of BorrowLabs' Website and/or the Services.

When legally required by a law enforcement or government agency to do so, BorrowLabs will share User information. BorrowLabs also may share Personal Data when it believe that disclosure is necessary to comply with a court order or judicial proceeding. Additionally, BorrowLabs reserves the right to disclose any of User Personal Data that it believes is necessary to mitigate liability, comply with audit, regulatory or compliance requirements, defend against claims of third parties, to assist government enforcement agencies, to protect the security of Website and/or the Services, or to protect the rights of BorrowLabs' Users, BorrowLabs and Affiliated parties or others. Finally, Personal Data may be disclosed or transferred as part of, or during negotiations of, a merger, consolidation, sale of BorrowLabs' assets, as well as equity financing, acquisition, strategic alliance or in any other situation where Personal Data may be transferred as one of the business assets of BorrowLabs.

International Data Transfers. BorrowLabs is based in California, USA, and Users' Personal Data is collected and processed in accordance with USA privacy laws and EU General Data Protection Regulation.

BorrowLabs may share, store, process and strive to process all Users' data worldwide. When personal data is shared or transferred, BorrowLabs will ensure that the transfer will be subject to appropriate safeguards in accordance with applicable data protection legislation and that the level of protection is equivalent to that applicable in the USA and EU.

If User is located outside the USA, and User's location has laws governing data collection and use that differ from U.S. law, note that User is transferring User's personal information to the USA, and in such context, User is consenting to such transfer by providing User personal information.

Security. BorrowLabs has taken steps to ensure that the Personal Data collected by BorrowLabs is secure. BorrowLabs has also taken a range of technical and organizational measures to protect the confidentiality, security, and integrity of the Personal Data collected from User including protecting Users' data from unauthorized access, loss, change or deletion. Personal Data is stored in secure operating environments that are not available to the public and that are only accessible to authorized employees, consultants and/or service providers.

BorrowLabs also has security measures in place to protect the loss, misuse, and alteration of the information under our control. Such actions include, but are not limited to, physical controls, encryption, eligibility restrictions, policies, etc.

BorrowLabs has put in place procedures to deal with any suspected personal data breach and will notify User and any applicable regulator of a breach where BorrowLabs is legally required to do so.

Privacy of Minors. BorrowLabs' Website is not meant to be used by anyone under the age of 18. BorrowLabs does not knowingly collect Personal Data such as name and email address from children under 18 years old, unless expressly permitted by parent or guardian. BorrowLabs believes it is important to safeguard the privacy of children and encourages parents to regularly take an interest in their children's use of online activities.

Governing Law. Any dispute, controversy or claim arising out of or in connection with this Policy, or the breach, termination or invalidity thereof, shall be governed by the laws and venue as stated in the Terms.

Privacy Notice for California Users. This section applies solely to Users who reside in the State of California, and is made in accordance with Governing Laws, the California Consumer Privacy Act of 2018 ("**CCPA**") and other California privacy laws. To the extent the provisions of this section conflicts with any other provision of this Policy, the provisions of this section shall prevail.

Personal Data does not include (in addition to the abovementioned provisions of this Policy) information excluded from the CCPA's scope, like personal information covered by other Federal or California privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

BorrowLabs collects and processes the following categories of Personal Data:

Categories of Personal Data	Source of Data	Purpose of Data	Personal Data can be shared with
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<p>Identifiers (Examples: name, address, IP address, email address, social security number and other identifiers)</p>	<p>User, or, with User's permission, third parties, User browser, computer, or mobile device, public records, service providers such as data providers, consumer reporting agencies.</p>	<p>Set up an account, make a credit decision on a loan, provide and improve Website and/or the Services to User, prevent and detect fraud, etc.</p>	<p>Service providers related to the customer transaction, data analytics companies, due diligence providers, business partner, purchasers/investors of loans, law enforcement agencies as required by Governing Law, marketing and advertising providers, customer experience analytics providers, cloud services providers, consumer reporting agencies, and third party partners such as those offering real estate related products.</p>
<p>Select Information in Customer Records (Examples: driver's license number, bank account number)</p>	<p>User, or, with User's permission, third parties, User browser, computer, or mobile device, service providers such as data providers, consumer reporting agencies.</p>	<p>Set up an account, make a credit decision on a loan, provide and improve Website and/or the Services to User, prevent and detect fraud, complete data or portfolio analysis, etc.</p>	<p>Service providers related to the customer transaction, due diligence providers, data analytics companies, cloud services providers, consumer reporting agencies, purchasers/investors of loans, business partners, law enforcement agencies as required by Governing Law.</p>
<p>Legally Protected Characteristics. (Examples: age, race, gender,</p>	<p>User, or, with User's permission, third parties, User browser, computer, or mobile device.</p>	<p>Adhere to state/federal regulations, provide and improve</p>	<p>Government agencies or law enforcement agencies as required by law, service providers related to</p>

citizenship, marital status)		Website and/or the Services to User.	the customer transaction, cloud services providers, purchasers/investors of loans.
Commercial information (Examples: Records of personal property)	User, or, with User's permission, third parties, User browser, computer, or mobile device, public records, service providers such as data providers, consumer reporting agencies.	Make a credit decision on a loan, etc.	Service providers related to the customer transaction, data analytics companies, real estate related companies, fix and flip companies, purchasers/investors of loans, cloud services providers, law enforcement agencies, marketing and advertising providers.
Internet/network activity. (Examples: browsing history, search history, and interaction with our website)	User, or, with User's permission, third parties, User browser, computer, or mobile device; service providers and partners such as marketing and data providers; and third parties such as advertisers and analytics providers.	Provide, improve, and resolve errors in Website and/or the Services; prevent fraud and ensure the security of Website and/or the Services; provide and improve advertising, and products offered.	Service providers such as analytics, diagnostic, cloud, customer service, advertising and marketing providers, law enforcement as required by law, and third-party partners such as those offering real estate related products.
Geolocation data. (Examples: physical location)	User, or, with User's permission, third parties, User browser, computer, or mobile device (if you grant us access to it).	Adhere to state/federal regulations; provide and improve Website and/or the Services.	Service providers related to the customer transaction, law enforcement as required by law, cloud services providers, and customer experience analytics providers.

<p>Inferences from other PI (Examples: information derived from another source of data reflecting your preferences)</p>	<p>User, or, with User's permission, third parties, User browser, computer, or mobile device; service providers and partners such as marketing and data providers; and third parties such as advertisers and analytics providers.</p>	<p>Provide and improve advertising, and products offered.</p>	<p>Advertising and marketing providers, data analytics and customer experience providers, cloud services provider.</p>
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Rights of California Users. California Users have the following specific rights under the CCPA regarding their Personal Data. These rights do not apply to business consumer Personal Data.

A) Opt-out of sales. BorrowLabs may sell User's Personal Data to a third party for a business or commercial purpose (for example, sale of the following categories of information to advertising partners for such advertising purposes: identifiers such as IP address, device IDs, cookie IDs, and advertising IDs). User has the right to instruct BorrowLabs not to sell User's Personal Data by making a corresponding request at email help@borrowlabs.com.

B) Access to Personal Data. User has the right to request BorrowLabs to disclose following information to User (for the past 12 months) including: the categories of personal information BorrowLabs collected about User, categories of sources for the Personal Data BorrowLabs collected about User, BorrowLabs' business or commercial purpose for collecting or selling that Personal Data, the categories of third parties with whom BorrowLabs shares Personal Data, the specific pieces of Personal Data BorrowLabs collected about User, and if BorrowLabs sold or disclosed User's Personal Data for a business purpose: the Personal Data categories that each category of recipient purchased or Personal Data categories that each category of recipient obtained.

C) Deletion Request Right. User have the right to request that BorrowLabs deletes any of User's Personal Data that BorrowLabs collected from User and retained, subject to following exceptions: (i) retaining the information is necessary for BorrowLabs and/or or BorrowLabs' service providers to complete the transaction (deal, contract, agreement, etc) for which BorrowLabs collected the Personal Data, provide Service that User requested, or take actions reasonably anticipated within the context of BorrowLabs' ongoing business relationship with User; (ii) retaining the information is necessary for BorrowLabs and/or or BorrowLabs' service providers to detect security incidents, protect or prosecute against fraudulent, or illegal activity, or debug Website and/or the Services; (iii) retaining the information is necessary for BorrowLabs and/or or BorrowLabs' service providers to comply with the California Electronic Communications

Privacy Act or any other legal obligations; (iv) retaining the information is necessary for BorrowLabs and/or or BorrowLabs' service providers for internal uses that are reasonably aligned with common User's expectations or other internal and lawful uses.

To exercise the opt out, access, data portability, and deletion rights described above, please submit a verifiable consumer request to BorrowLabs through one of the following methods: (i) completing this [CCPA Request Form](#), or (ii) email at help@borrowlabs.com. Only User or a person registered with the California Secretary of State that User authorizes to act on User's behalf, may make a verifiable consumer request related to User Personal Data (the request must provide sufficient information to verify User or an authorized representative). The approximate timing for respond to the request is 60 calendar days of its receipt. Any information BorrowLabs provides will only cover the 12-month period preceding the request's receipt.

Non-Discrimination. BorrowLabs will not discriminate against User for exercising any of User's CCPA rights.

Changes to this section of Policy. BorrowLabs is required by law to update this section of Policy at least once each year (last updated on April 5, 2021).

Changes of Policy. This Policy, with the exception to the section "Privacy Notice for California Residents", may be subject to change from time to time. If substantial changes are made to the Policy, BorrowLabs will notify User of these material changes by posting them on the Website. Users are encouraged to check back and review this Policy from time to time so that User will always know what information is collected, how it is used and to whom it is disclosed. User's continued use of the Website and/or the Services, User content and/or intellectual property subject to this Policy will signify User's acceptance of Policy changes.

Contact. If User have any questions about this Policy, please contact BorrowLabs at legal@borrowlabs.com.