

# Privacy Policy

## 1. Introduction

We are committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible manner. This Privacy Policy explains how AVOLOAN INC. ("Avoloan") collects, uses, discloses, and protects your information when you visit our website ("Site") or use our services, including an application on App Store called "Avoloan" (separately, the "Application", collectively, the "Services").

By accessing or using our Site and/or Application, you consent to this Privacy Policy and the Terms and Conditions of Use both for our Site and application "Avoloan." We may periodically update or revise this Privacy Policy to describe new Services

or changes to our practices. You can determine when this Policy was last revised by referring to the "Effective Date" at the top of this Policy. We encourage you to review the Policy whenever you interact with us to stay informed about our privacy practices and the ways that you can help protect your privacy. If we make significant changes to this Policy, we will notify you through a prominent notice on our Site or Application, release updates, via email address associated with your account, or as required by applicable law. Your continued use of our Site or/and Application is deemed to be acceptance of those changes.

## 2. Information We Collect

We may collect the following types of information:

|   |                           |                                                                                                                                                                                                                                                                                                                                                     |
|---|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Personal information      | Full name, date of birth, sex, citizenship and residence information, address, financial information (such as annual income), social security number or/ and individual taxpayer Identification number, telephone number, email, ID/ driving license number and expiry date, details on your employment such as name of employer and your position. |
| 2 | Verification Information  | Information for verification (fraud) checks, including verification of your identity (biometrics) and other information you provide (e.g. security word).                                                                                                                                                                                           |
| 3 | Usage Information         | Details about your interactions with our Site and Application, including IP address, browser type, access times, pages viewed, device information, geolocation information, unique account number, login and password details and the referring website.                                                                                            |
| 4 | Transactional Information | Details about transactions you carry out through our Application, including loan applications and repayments. We also may request bank transactions from other banks, tax forms or payslips.                                                                                                                                                        |
| 5 | Third-Party Information   | Information from third-party services that you link to your account, such as financial institutions. This includes, but not limited to biometric data (date of biometrics), credit score data (credit report).                                                                                                                                      |
| 6 | Bank Accounts Information | Bank card/account details, bank accounts closure documents/proofs.                                                                                                                                                                                                                                                                                  |
| 7 | Other Information         | Information that you voluntarily provide to us related to the Services or when we provide you with customer support by phone or email or otherwise or that we may collect as permitted by law and with your consent (where required by law).                                                                                                        |

Unless expressly requested, please do not provide us with your health information. Any unsolicited

information related to your health is disclosed at your own risk.

### 3. Information We Collect Automatically

We may collect certain information automatically when you use our Site or Application, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Site, such as pages that you visit before, during and after using our Site, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Site or Application.

We may use third parties to engage in such collection activities on our behalf. For example, we use Google Analytics on our Site which automatically collects the following information about you, your device, and your usage of our Site:

- Site Usage information — We collect information about your usage and behavior on our Site and/or Application, such as your browsing history of the content you have visited on our Site, including how you were referred to our Site via other websites, or recording your activity using session replay technology.

- Device information — We collect information about the type of device you use when you access our Site including details of your computer or mobile, such as the unique device identifier, biometric data, unique advertising identifier, and browser used to access our content.

- Geolocation information — We collect information about your IP address, which is a numerical code to identify your device, together with the country, region or city where you are based.

- Anonymized statistical information — We may collect other information provided to us through analytics services.

To opt out of being tracked by Google Analytics, you may visit the [Google Analytics Opt-Out Browser Add-on](#). You may access Google's privacy policy [here](#).

When you visit our Site, we store cookies on your browser to collect information. The information collected might relate to you, your preference or your device, and is mostly used to make the Site work as you expect it to and to provide a more personalized web experience. You have choices available to you with regard to some advertising cookies. Please visit the Digital Advertising Alliance [here](#) or the Network Advertising Initiative [here](#) or [here](#).

In addition to cookies, we may use pixel tags, also known as web beacons, and other online tracking technologies (collectively "Technologies") to automatically collect information through your use of our Site. Our use of these Technologies fall into the following general categories:

- Operationally Necessary. This includes Technologies that allow you access to our Site, our Application, and tools that are

required to identify irregular Site behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;

- Functionality-Related. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Site and/or our Application. This may include identifying you when you sign into our Site or keeping track of your specified preferences, interests, or past items viewed;

- Performance-Related. We may use Technologies to assess the performance of our Site, including as part of our analytic practices to help us understand how individuals use our Site;

- Analytics. We may use Technologies and other third-party tools to process analytics information on our Sites, such as session replay services, which allow us to record and replay an individual's interaction with the Site. These Technologies allow us to better understand how our Site is used and to continually improve and personalize our Site. For example, one of our analytics partners includes Google Analytics as described above.

- Advertising- or Targeting-Related. We may use first party or third-party Technologies, which may include cross-device tracking, to deliver content, including ads relevant to your interests, on our Site, or on third-party digital properties. Some of the advertising Technologies we use may include social media.

- Social Media Platforms. Our Site or Application may contain social media buttons, such as Instagram, Twitter, and LinkedIn, which might include widgets such as the "share this" button or other interactive mini programs. Your interactions with these platforms are governed by the privacy policy of the company providing it.

Our Site or Application does not respond to Do Not Track signals.

### 4. Deidentified Information

We may generate deidentified information from the personal information that we collect about you as described above. The deidentified information will be maintained in a form that cannot reasonably be used to infer information about, or otherwise be linked to, you as a particular consumer.

We will take reasonable measures to ensure that the deidentified information cannot be associated with a consumer or household. We publicly commit to maintain and use the deidentified information in a deidentified form and not to attempt to reidentify the information, except we may attempt to reidentify the information solely for the purpose of determining whether our deidentification processes satisfy the requirements of applicable law. We will also contractually obligate any recipients of the deidentified information to comply with all applicable law regarding their handling of such deidentified information.

## 5. How We Use Your Information

We use your information for the following purposes:

- Provide and Improve our Site and Services — We use your personal information, verification information, transactional information, third-party information, bank accounts Information and other information to manage your account, provide, operate, monitor, maintain and administer our Site and Services, and to improve our offerings to you, including to develop new products.
- Communicate with you about our Services — We use your personal information to contact you regarding updates to our Services or to communicate with you concerning your account and transactions.
- Send and improve marketing communications — We use your personal information for our marketing activities according to your preferences, including communicating with you via email.
- Provide customer support — We use your personal information to provide customer support if you run into issues with our Site or Application, or to verify your identity when exercising your privacy rights.
- Provide and improve necessary functionality — We use your usage information, and anonymized statistical information to provide the necessary functionality required for you to use our Site and Application and to improve our Site and Application based on this information.
- Promote the security of our Site and Application — We may use your personal information, usage information, and anonymized statistical information to investigate and prevent malicious, deceptive, fraudulent, or illegal activity, and enforce our terms and policies.
- Legal, regulatory, safety, and compliance purposes — We may use the categories of information collected for purposes of compliance with laws or regulations and to review compliance with applicable usage terms.
- Other purposes — We may process the categories of information collected for other purposes about which we notify you in advance or for which we receive your consent (such as in the event of a corporate sale, merger, or acquisition).

## 6. Information Sharing and Disclosure

We may share your information with:

- Contractors, service providers, and other third parties we use to support our business, our products and services, such as for fraud prevention, servicing, bill collection, debt collection, marketing and technology services, product development, nonaffiliated financial institutions that we partner with to market or provide the products or services to you.
- Credit reporting agencies to report account information as authorized by you or otherwise permitted by law.
- Law enforcement, government officials, or other third parties as required by law and when we believe that such disclosure is

necessary to protect our rights and/or comply with a judicial proceeding, court order, regulatory request or other legal process.

- Third parties when we have a legitimate business purpose as permitted by law.
- Buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Avoloan's assets in which personal information held by Avoloan about our Site or Application users is among the assets transferred.
- Other third parties with your consent or authorization.

We do not share or sell your personal information with any third party other than as described in this Privacy Policy.

## 7. Third-Party Websites

This Site and Application may contain links to other websites operated by third parties, including social media providers. Avoloan cannot and does not control the privacy practices of these third-party websites. Avoloan does not endorse the content or information of any third-party website or resource and, further, Avoloan does not warrant that such websites or resources will not contain viruses or other malicious code or will not otherwise affect your computer. By using any link on our Site and Application to connect to a third-party website, you agree and understand that Avoloan shall not be responsible or liable, directly or indirectly, for any damages or losses caused or alleged to be caused by or in connection with the privacy practices of any third-party websites.

## 8. Data Security

We implement various security measures to protect your personal information from unauthorized access, use, or disclosure. These include encryption, secure servers, and regular security assessments. For example, we encrypt every page of our Site with Secure Socket Layer (SSL) to protect your data.

## 9. Your Choices

You have the following rights regarding your personal information:

- Access and Correction: You can access and update your personal information by contacting us.
- Opt-Out: You can opt-out of receiving promotional communications from us by following the instructions in those communications.
- Data Deletion: You can request the deletion of your personal information, subject to certain legal obligations.

You can execute all these rights by emailing us at [hello@avoloan.com](mailto:hello@avoloan.com).

## 10. Data Retention

Due to the regulated nature of our industry, we are legally required to retain data and cannot typically delete consumer transactional data, credit or deposit account application data, or other financial information upon request. State and federal regulations may mandate that we maintain and report demographic information on our collective membership activities. Additionally, we may be required to retain information about you for a minimum of seven years to comply with applicable laws regarding recordkeeping, reporting, and audits. The duration for which we retain your information is primarily determined by legal requirements and the usefulness of the information for its intended purposes.

## 11. Children's Privacy

Our Services are not intended for individuals under the age of 18. We do not knowingly collect personal information from children under 13. If we become aware that we have inadvertently collected such information, we will take steps to delete it.

## 12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any material changes by posting the new policy on our Site and updating the effective date. Your continued use of our services after the changes take effect constitutes your acceptance of the revised policy.

## 13. Additional Steps You Should Take to Ensure the Security of Your Information

Avoloan does not and cannot guarantee the security of your information submitted through the Site and Application, and we encourage you to take steps to secure your information. You should not include any personal identifying information in your account ID. You should always choose a unique password that is difficult for others to guess and change your password

frequently. At a minimum, we require the use of both numbers and letters in your password. You should never share your password with anyone. Your password is not known to Avoloan, and we will never ask for your password.

Avoloan sends important communications regarding your account via email. You should take steps to secure and restrict access to your email account. You should also be aware of fraudulent emails known as "phishing," from companies claiming to be Avoloan and requesting your login information or other account information. Avoloan will never ask for your login information.

We also recommend you avoid using public computers and networks and delete browser cache files after using the Site and the Application.

If you believe the security of your account is compromised or to report any concerns, please contact us [hello@avoloan.com](mailto:hello@avoloan.com).

## 14. Contact Us

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

**Avoloan Inc.**

Address: **254 Chapman Rd, Ste 208 #17752, Newark, Delaware 19702 US**

Email: [hello@avoloan.com](mailto:hello@avoloan.com)