# Simple Path Financial Online Privacy Policy

# Last updated: September 27, 2023

This Online Privacy Policy applies to www.simplepathfinancial.com, owned and operated by Simple Path Financial (sometimes referred to as "Company", "we" or "us"),

We take our ethical responsibilities and your privacy seriously. We have a strong commitment to providing excellent service to all our customers and visitors to this website, including respecting your concerns about privacy. This Privacy Policy discloses how we collect, protect, use and share information gathered about you on our website. If you use this site you explicitly agree to the terms and conditions of the Privacy Policy in effect at the time of your use. We hope that this disclosure will help increase your confidence in our website and enhance your experience on the Internet.

## Browsing

We may use IP addresses, browser types and access times to analyze trends, administer the site, improve site performance and gather broad demographic information for aggregate use. When you request a page from our website, our servers log the information provided in the HTTP request header including the IP number, the time of the request, the URL of your request, and other information that is provided in the HTTP header. We collect the HTTP request header information in order to make our website function correctly and provide you the functionality that you see on this website. We also use this information to better understand how visitors use our website and how we can better tune it, its contents and functionality to meet your needs.

# **Call Monitoring**

Please note that all calls with the Company may be recorded or monitored for quality assurance and training purposes.

## Information We Collect and Its Uses

We collect your personal information if you decide to purchase one of our products or retain our services, subscribe to our newsletter, visit our webpage, complete an application form, participate in one of our surveys or transact other business with us. We need to collect personally identifiable information from you to execute a requested transaction, provide you with a particular service, improve our website, engage in targeted advertising, and/or to further enhance your account. At any time, we may ask you to voluntarily supply us with additional information needed. We will ask you for information such as, but not limited to: name, current and/or billing address, your email address, telephone number and, if you purchase one of our products or services, a valid credit card number, your Social Security number and certain other personal information, such as your date of birth, address, financial information, and certain credit card and loan account information. We may use your email address to send a confirmation and, if necessary, we might use the other information to contact you for help in processing.

In addition, when you provide contact details for transaction requests such as scheduling an appointment or requesting a proposal, we will use the contact information to keep you updated about future offers or promotions, unless you opt-out online or otherwise notify us.

We may also use the information we collect about you in order to, but not limited to:

- Learn more about your interest in the products or services we offer and provide you with information.
- Enroll customers who desire our services.
- Open customer files and establish their accounts.
- Provide customer service.
- Offer or refer loans.
- Learn how to improve our products or services.
- Provide opportunities for our affiliates and other companies to inform you about the products or services they offer that may interest you.
- Share aggregated statistical data with our business partners or for public relations.
  - For example, we may disclose that a specific percentage of our users are between the ages of 25 and 35.

## **Disclosure of Information to Third Parties**

We may disclose a consumer's personally identifiable information in order to effect or carry out any transaction that you have requested of us or as necessary to complete our contractual obligations with you.

The personal information collected on this website will be used to operate the website and to provide the services or products or carry out the transactions you have requested or authorized or to improve our website or and our services. We may change or broaden the use of your personal information at any time. We may use your personal information to provide promotional offers to individuals by means of email advertising, telephone marketing, direct mail marketing, banner advertising, and other possible uses.

### **Service Providers**

We may use other third parties to provide certain clerical, processing, and shipping services or to assist in providing the services that you requested. As such, we may share your personally identifiable information with service providers as necessary to carry out these tasks. When you contract with us, we will share only as much information with our service providers as is necessary for the provision of their services. These third parties are prohibited from using your personally identifiable information for any other purpose other than carrying out their contract services.

### Choice/Opt-Out

We provide you the opportunity to 'opt-out' of having your personally identifiable information used for certain purposes, when we ask for this information. For example, if you purchase a product/service but do not wish to receive any additional marketing material from us, you can indicate your preference on our order form.

If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included in each newsletter or communication or by contacting us using the contact information below.

If you do not wish to have your personal information shared or disclosed to any third-party that is not our agent/service provider, please <u>visit our data request page</u>, or call us at Phone: 855-737-2831. Some services such as loan referrals require our ability to share your personal information.

## Securing the Transmission and Storage of Information

The security of your personal information is extremely important to us. We employ generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

Our site uses SSL (Secure Sockets Layer) security technology to encrypt information you provide to us through the site when entering sensitive information (such as credit card number and/or social security number) on our registration or order forms. This ensures that your information is encrypted as it travels over the Internet. SSL is an industry-standard protocol for encryption over the internet.

After information reaches Simple Path Financial, it is stored on a secure server that resides behind firewalls designed to block unauthorized access from outside of Simple Path Financial. You can help to maintain the security of your online transactions by not sharing your personal information or password with anyone. Remember, no method of transmission over the Internet, or method of electronic storage, is 100% secure. (Example: any information you provide us by email is not encrypted) Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

If you have any questions about the security on our website, please feel free to email us.

## Supplementation of Information

In order to provide certain services to you, we may, on occasion, supplement the personal information you submitted to us with information from third-party sources.

### Log Files

As is true of most Web sites, we automatically gather certain information and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating

system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically collected data to personally identifiable information.

### Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information you submit while on our site, though some information such as IP address, device, and web browser may be sent to third parties and collected to improve your usage on our site.

We use session ID cookies. We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. We can at your option set a persistent cookie to store your passwords, so you don't have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our site.

If you reject cookies, you may still use our site, but your ability to use some areas of our site will be limited.

## Clear Gifs (Web Beacons/Web Bugs)

We employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personally identifiable information.

We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see "Choice and Opt-out."

This privacy statement applies only to information collected by this website.

## Access to Personally Identifiable Information

If your personally identifiable information changes, or if you no longer desire our product or service, you may correct, update, delete or deactivate the same by <u>visiting our data request page</u>. Or, if you prefer, you can contact us by telephone or postal mail.

#### **Customer Service**

If you send us correspondence, including e-mails and faxes, we may retain such information in your customer file. Information you give us over the telephone may be noted for your file. We may also keep copies of any correspondence sent to you. We retain these records in order to provide the products and services you have requested and to measure and improve our customer service. We may, over time, delete these records as permitted by law. Phone calls may be recorded or monitored for customer satisfaction purposes.

Based upon the personally identifiable information you provide, we may communicate with you to provide the services you request, and to manage your account. We may communicate via email or telephone, in accordance with your wishes.

#### Legal Disclaimer

We reserve the right to disclose your personally identifiable information, as required, to comply with the law, applicable regulations, governmental and quasi-governmental requests, judicial proceedings, court orders or subpoenas, to enforce our Legal Notices or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.).

#### **Business Transitions**

In the event our company goes through a business transition, such as a merger, acquisition by another company, or

sale of all or a portion of its assets, your personally identifiable information will likely be among the assets transferred. You will be notified via e-mail and/or a prominent notice on our Web site for 30 days of any such change in ownership or control of your personal information.

# **Changes to this Privacy Statement**

We may update this policy from time to time as our information practices are modified or changed. If we make changes to the Privacy Notice, we will revise the "Last Updated" date at the top of this Notice. Any changes to this Notice will become effective when we post the revised Notice on the Site. Your use of the website following these changes means that you accept the revised Notice. The provisions contained in this privacy statement supersede all previous notices or policies regarding our privacy practices with respect to this website.

We encourage you to check our website frequently to see the current privacy statement and/or to be informed of how we are committed to protecting your information.

## Testimonials

We display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us using the contact information below.

# **Data Privacy Notice**

You may have some rights to learn more about the types of data we collect, limit what information we collect, correct information we collect, or request that we delete such information. To exercise any of these requests, please visit our <u>data request page</u>.

To learn more about what information we may collect and your rights regarding that information please visit our <u>Privacy Notice page</u>.

If you have any questions, comments, complaints or suggestions regarding our privacy policy or our website, please contact us at:

Simple Path Financial 16842 Von Karman Avenue Suite 300 Irvine, CA 92612 P: 855-737-2831 info@simplepathfinancial.com

Please print and retain a copy of this privacy policy for your records