

FACTS**What Does West Creek Financial, Inc. (“West Creek”) Do With Your Personal Information?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and transaction history
- Account balances and payment history
- Credit history and credit scores

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons West Creek chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does West Creek share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes— information about your transactions and experiences	No	N/A
For our affiliates’ everyday business purposes— information about your credit worthiness	No	N/A
For our affiliates to market to you	No	N/A
For nonaffiliates to market to you	No	N/A

Questions?

Call 844.937.8275 or email us at CustomerService@westcreekfin.com or go to <https://westcreekfin.com/>.

Who we are	
Who is providing this notice?	West Creek
What we do	
How does West Creek protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does West Creek collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ open an account or apply for a loan ▪ provide account information or give us your contact information ▪ pay your bills <p>We also collect your personal information from others, such as credit bureaus.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	We do not offer joint accounts. Your account is held individually by you.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ Nonaffiliates we share with can include companies engaged in the direct marketing and the selling of consumer products and services.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ Our joint marketing partners include other financial companies.
Other important information	
<p>For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.</p> <p>North Dakota Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account.</p> <p>For Vermont Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by Vermont law, such as to process your transactions or to maintain your account. In addition, we will not share information about your creditworthiness with our affiliates except with your authorization.</p>	

PRIVACY STATEMENT-CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the West Creek Financial Privacy Notice and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”).

The CCPA requires us to disclose certain information regarding our collection, use, and sharing of personal information. In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver's license number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, driver's license or state identification card number, employment, employment history, bank account number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
C. Professional or employment-related information.	Current or past job history

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, like:
 - Certain 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;
 - Certain personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) (certain consumer/credit report information), the Gramm-Leach-Bliley Act (GLBA) (certain financial information) or California Financial Information Privacy Act (CFIPA) (certain financial information), and the Driver's Privacy Protection Act of 1994 (DPPA) (motor vehicle records).
 - Employee Information

We obtain each category of personal information identified in the chart above from the following categories of sources:

- Directly from our consumers through the submission of applications for financing.
- Indirectly from our consumers. For example, through information we collect from our consumers in the course of providing services to them and collection transaction information.
- Directly and indirectly from activity on our website (www.westcreekfin.com). For example, from submissions through our website portal or website usage details collected automatically.
- From service providers and third parties that interact with us in connection with the services we perform. For example, from credit reporting agencies when we evaluate applications to make credit decisions.
- From government entities from whom public records are obtained

Use of Personal Information

We may collect or disclose the personal information in each category identified in the chart above for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to finance a purchase, we will use that information to evaluate the application and determine whether to approve or decline.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts and other notices concerning our products or services that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information without providing you notice. We will not use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice and obtaining your explicit consent.

Sharing Personal Information

We may disclose your personal information to a service provider for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business or commercial purpose:

- | | |
|-------------|--|
| Category A: | Identifiers. |
| Category B: | California Customer Records personal information categories. |
| Category C: | Professional or employment-related information. |

We disclose each category of personal information identified in the chart above for a business or commercial purpose to our service providers and the following categories of third parties:

- Our affiliates.
- 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.

In the preceding twelve (12) months, we have not sold any personal information. We do not and will not sell your personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Personal Information

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your personal information over the past 12 months. That information includes:

- *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 disclosing that personal information.*
- *The specific pieces of personal information we collected about you (also called a data portability request).*
- *If we disclosed your personal information for a business or commercial purpose:*
 - *The categories of personal information that we disclosed about you for a business or commercial purpose; and*
 - *The categories of third parties to whom your personal information was shared or disclosed for a business or commercial purpose, and which category of personal information was disclosed to that category of third party.*

Once we receive and confirm your verifiable consumer request, we will respond to your request.

Deletion Request Rights

You have the right to request deletion of any of your personal information, subject to certain exceptions.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer's free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.

9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise your rights to access, data portability, or deletion as described above, please submit a verifiable consumer request to us by either:

- Calling us at 855.705.5624
- Submitting a request form through our website at www.westcreekfin.com or www.westcreekfin.com/ccpa-request

Only you, an individual you designate to us as an authorized agent, or a business registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. In order to designate an individual as an authorized agent you would need to contact us and provide the authorization.

We will only respond to two verifiable consumer requests for access 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. This may include matching identifying information you provide to information we have on file. If you do not have a password-protected account with us, we will also ask you to provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.
- 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. We will not disclose a consumer's Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers. In addition, we will not provide you with certain information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of that personal information, your account with us, or the security of our systems or networks.

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 and Format

We will provide you with a confirmation receipt within 10 days along with information regarding how we will process your request. We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically unless you have opted not to receive disclosures electronically from us. Any disclosures we provide will only cover the 12-month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will provide your personal information in a format that is portable and readily useable and should allow you to transmit the information from one entity to another entity without hindrance. For all other requests for personal information, we will 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.

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

We will not discriminate against you for exercising any of your CCPA rights. Unless otherwise 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.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage. This privacy policy was last updated on January 1, 2020.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 855.705.5624

Website: www.westcreekfin.com/ccpa-request

Email: Privacyinforequest@westcreekfin.com

Postal Address:

West Creek Financial

PO Box 5518

Glen Allen, VA 23058-5518