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# 1 PRIVACY POLICY

## Revision History

Document Control			
Document Title	Privacy Policy		
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Document Manager/Approver	Vivienne Hsu, CEO		
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11/15/2017	1.0		Reviewed - VH
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09/04/2024	4.0		Reviewed – VH

This Privacy Policy applies to [www.LENDonate.com](http://www.LENDonate.com), owned and operated by LENDonate, Inc. (“LENDonate”). This privacy policy describes how LENDonate collects and uses personally identifiable information.

Your privacy and the protection of your personally identifiable information are important to us. Personally identifiable information is information that can be used on its own or with other information to identify someone. Please read this Privacy Policy carefully to get a clear understanding of how we collect, use, protect, and otherwise handle your personally identifiable information on our website.

This Policy will be reviewed periodically (at least once a year) and updated as necessary. Changes are drafted by Document Owner. Any changes are approved by Document Manager/Approver.

## 2 INFORMATION LENDONATE COLLECTS ABOUT YOU

### 2.1 INFORMATION PROVIDED BY YOU

We collect personal and financial information that you provide to us while you use the site via desktop or mobile devices. The information collected depends on the type of user you are and the type of services you have consented for us to provide to you. Most of our collection of your information occurs during the site registration process or the Borrower loan application process. Below are examples of activities where you provide information to us.

#### **All website browsers – including those who are not registered users:**

- can access and review any public information available on the website without providing personal information.
- can submit an inquiry via email or our contact form. We will receive names and email addresses of individuals who contact us with questions about LENDonate, our lending/borrowing operations or to provide feedback about our products and services. We'll only use this information to respond directly to the individual's question.

#### **New Registered Users: Borrowers, Investors or Advisors:**

- Registration Process - specific information must be supplied when users register on the site. The requirements for registration are different for Borrowers, Investors, and Advisors but basic information collected may include:
  - Your name
  - Your email address
  - Your home address and phone number
  - Your job title (Borrowers and Advisors only)
  - IRA custodian name and account number (Investors only, if applicable)
  - Your CRD #, company name, and company CRD # (Advisors only)
- Accredited Investor Verification Process – additional information must be supplied if registered users want to participate in investment activities. Information may include:
  - Date of Birth and Social Security number
  - Bank account information (for ACH or wire transfers)

### **Registered Borrowers:**

- Loan Application Process – When a registered Borrower is applying for a loan, most of the information collected is related to the Nonprofit Organization (such as EIN, organization name, address, etc) which is publicly available information. However, other data (e.g. financial statements) may need to be collected to meet underwriting and legal requirements and/or other terms or requirements to properly service the loan.

The following personal information may be collected from Borrowers during the loan application process:

- Related to key organization members – Borrowers may be asked to submit member resumes which may include names, addresses, phone numbers, education and work history.
- Related to a Guarantor of a loan - if a Guarantor is personally guarantying a loan – name, address, phone number, date of birth, social security number, brokerage or bank account statements may be collected from the Guarantor.

### **Verified Investors, Borrowers and Advisors:**

- Loan Discussion Forums – Verified Investors, Borrowers (owners of the loan) and Advisors on behalf of their clients can submit questions or comments via loan discussion forums. We capture the users name, comments, timestamp and preferences regarding notifications when new submissions are posted or their submission has been replied to.
- User Account Profile – All verified users can update their personal information within their account profile, which contains information shared during registration and other user questions. Not all questions are required to use the platform but answers can help tailor information that is shared to the user.

## **2.2 INFORMATION COLLECTED FROM THIRD PARTIES**

### **For Verified Investors who would like to participate in lending activities:**

We will collect information from third parties to verify your identity.

You'll be required to verify that you are an accredited investor and fund your account.

If you choose to use PayPal to fund your account, bank account and/or credit card information will be required by PayPal. We do not collect or store this information. [PayPal's Privacy Policy](#).

### **For Verified Investors with Advisors:**

If you conduct business with LENDonate through your investment professional (Advisor), we may exchange information we collect with your investment professional (Advisor) or with others they may authorize.

### **For Borrowers who apply for a loan:**

We may collect information from third parties to verify the identity of the registered Borrower and other key members of the organization including Guarantors. This includes checks to complete anti-fraud, anti-money laundering due diligence.

If another company refers you to LENDonate or assists you in any way in the application process, we may also collect your information from that company in order to process your application.

## **2.3 INFORMATION COLLECTED USING TRACKING TECHNOLOGY**

Anytime a person visits our website – registered and non-registered users - we collect information about your computer and your visits to our website, such as your IP address, geographical location, browser type, referral source, length of visit, and page views. We use this aggregated information in the administration of our website to improve its usability and to evaluate our strategies for marketing, advertising, and search engine optimization. This may include sharing your information with third parties to perform ad measurement services on your behalf.

### **Google Analytics:**

We use Google Analytics, a web analytics service of Google Inc., (“Google”). Google Analytics uses cookie text files to analyze how our Site is used. Google uses the data stored on these cookies to compile reports on website activities and to provide further services related to the use of the website. [Google's privacy policy](#).

For more details on how Google Analytics collects and processes data, you can review everything on their website using the link: [How Google uses data when you use our partners' sites or apps](#).

### **What are your choices regarding Google Analytics?**

If you want to opt-out, download and install the Google Analytics Opt-out add-on for your web browser. The add-on is designed to be compatible with Chrome, Internet Explorer 11, Safari, Firefox and Opera. In order to function, the opt-out add-on must be able to load and execute properly on your browser. [Download Google Analytics Opt-out Browser Add-on](#).

### **Cookies and similar technologies:**

LENDonate's website uses cookies. Cookies are small files that a site or its service provider transfers to your computer/device's hard drive through your browser (if you allow them), which enables the site's or service provider's systems to recognize your browser, to capture and to remember certain information. They are used to track your user session and help us understand your preferences based on previous or current site activity; this allows us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer a better site experience and offer better user tools in the future.

Our website also has social media features, such as social sharing to Facebook. These features may collect your IP address and other information such as the pages you are visiting on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

### **Where can you find more information about cookies?**

You can learn more about cookies at [All About Cookies.org](#).

### **What are your choices regarding cookies?**

Most browsers allow you to control cookies through their settings preferences. You may limit the ability of websites to set cookies or delete cookies. If you'd like to delete cookies or instruct your Internet browser to delete or refuse cookies, please visit the help pages of your web browser. If you choose to reject cookies, your ability to use some features or areas of our site may be limited and your overall experience may be diminished.

## **3 WHAT WE USE YOUR INFORMATION FOR**

### **User Registration and other personal identifying information will be used to:**

- Verify users' identities and fraud detection - enable registered users to log into the site, verify that borrowers and investors are at least 18 years of age, and guard against fraud.

**Borrowers' information will be used to:**

- Allow LENDonate to conduct activities and transactions that need to occur during the lending process
- Allow LENDonate to complete fund transfers (via ACH and wires)
- Contact you if there are any problems completing transactions you request or to discuss any problems with your account
- Implement loan serving and loan collection activities as needed
- Maintain regular communications with you concerning any requests for assistance, submissions of loan requests, payments, transfers of funds, or any other transactions you request.
- Create user profiles with general information related to the nonprofit borrower that only the nonprofit borrower (or a LENDonate Admin) has access to view
- Create marketing materials to promote the nonprofit organization's loan on our marketplace; these may include a dedicated web page, email newsletters and social media posts.

**Investors' information will be used to:**

- Allow LENDonate to complete fund transfers (via ACH and wires)
- Contact you if there are issues completing a transaction you requested or to discuss any problems with your account
- Maintain regular communications with you as may be necessary to complete transactions you request, such as loan-to-donation conversion or transferring funds
- Generate reports for tax reporting
- Create user profiles with general information related to the Investor that only the Investor (or a LENDonate Admin) has access to view

**Advisors' information will be used to:**

- Allow our financial services partners to verify advisors' identities, implement fund transfers on behalf of your clients, and receive borrower payments provided to your client
- Contact you if there are issues completing a transaction you requested or to discuss any problems with you or your client's account

- Maintain regular communications with you as may be necessary to complete transactions you request (on behalf of your client), such as submitting loan portfolios or transferring funds
- Generate reports for tax reporting

### **Loan Discussion Forum**

- Investors' questions will be displayed on borrowers' campaign pages with the borrowers' answers displayed, in order to provide additional information about the campaign for prospective investors. Questions will not include the names of the individual or institution that made the inquiry.

### **Notifications and Communications**

- When you register with LENDonate, you will receive emails that confirm specific actions you request. You will normally receive notification emails confirming specific actions or activities of interest.
- If the Investor or Borrower chooses to be notified when someone responds to their Discussion Forum comment, the system will send them an email to notify them.
- Account information updates.

### **Customer Support**

- The emails and names of inquiries sent to support@lendonate.com or via the website's contact form are collected only for the purpose of maintaining ongoing communication with the people who have inquired about LENDonate or provided feedback about our products and services.

## **4 WHO WE SHARE YOUR INFORMATION WITH**

With the exceptions noted below, we do not sell, trade, or otherwise transfer your personally identifiable information to outside parties unless we provide you with advance notice.

We may disclose your personally identifiable information to the following persons or under the following circumstances:



**Nonprofit Borrowers:**

If a donation is made or an Investor converts a loan to donation, the donor's name and email will be shared with the nonprofit organization so they can provide you with a receipt for tax purposes.

**To Company Employees and Contractors:**

Similarly, our own professional advisors, such as lawyers and accountants, who are bound by a duty of confidentiality, may be required to access personally identifiable information for specific business purposes.

**Third Party Service Providers:**

Website hosting partners and other parties who assist us in operating LENDonate.com, in conducting our business, or helping us to provide services to you will have access on an as-needed basis to relevant personally identifiable information.

**Analytics / Research:**

Non-identifiable, aggregate data may be used for research purposes to better understand the tendencies and trends within the broad lending community.

**Business Transfers / Change of Ownership:**

If we are acquired by or merge with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company as successor in interest.

**Law Enforcement, Legal Process or Compliance**

**In Response to Legal Process:** We may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena.

**To Protect Ourselves and Others:** We may disclose the information we collect from you when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which LENDonate is involved.

## 5 DATA RETENTION

We will retain your information as long as your account is active or as needed to provide services to you. We will thereafter retain and use your information as long as we deem necessary to comply with our legal, regulatory, accounting or reporting obligations, to resolve disputes, and to enforce our agreements.

## 6 HOW WE KEEP YOUR INFORMATION SECURE

We take our role in safeguarding information about our customers seriously. We have physical, technical and operational controls in place in order to protect your personal information, both during transmission and once received. Technical controls include scanning our website on a regular basis for security holes and known vulnerabilities in order to make your visit to our website as safe as possible. In monitoring our website, we use Anti-Virus and Malware Scanning. Physical controls include using secure data centers. We use third party servers in California, provided by Amazon Web Services. Operational controls include our corporate policy that all employees are required to take a yearly Security Awareness Training. In addition, we use:

### **Encryption and website certificates**

We prioritize the security of your personal information by implementing advanced encryption technologies to protect your data both in transit and at rest. Our website is secured with industry-standard SSL certificates, ensuring that all data transmitted between your browser and our servers is encrypted and safeguarded against unauthorized access. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and who are required to keep the information confidential.

### **Session Time-outs**

Users are automatically logged out of the website after a specified period of inactivity reducing the risk of other people being able to access your account or information if you leave your computer unattended.

### **Passwords**

These are set by individual users and are not known by LENDonate. Passwords must contain a capital letter, a number and have a minimum of 8 characters. We will never ask a user for this information to access their account via phone, email or any other correspondence.

## 7 YOUR RIGHTS RELATED TO PERSONAL INFORMATION

### 7.1 ACCESSING, UPDATING, TRANSFERRING AND DELETING YOUR DATA

**Email Opt-out:** You may opt-out of marketing email communications by following the unsubscribe links at the bottom of our emails. You may also notify us via email at [support@lendonate.com](mailto:support@lendonate.com).

Registered users can update personal information by logging into your account and editing your profile. To update other information not available in your profile, please email us [support@lendonate.com](mailto:support@lendonate.com).

If you wish to access any personal information we hold about you, or to request that we delete or transfer any information about you that we have obtained, please submit a request via email to [support@lendonate.com](mailto:support@lendonate.com).

Please note that we may need to retain certain information for recordkeeping purposes or to complete transactions, or when required by law. We will also need to verify your identify before completing any request relating to personal information.

## 8 THIRD PARTY LINKS

We may provide links to partners' sites. We make the decision to provide links to these sites based on the quality of information they provide at the time the links are published on our site. We make every effort to monitor the continuing quality of the content of these sites. However, these external sites are not subject to this Privacy Policy and may have different approaches to handling the information of their visitors. Please consult the privacy policies of these sites before providing personal information. LENDonate has no control over the content of these sites or these sites' privacy policies.

## 9 COMPLIANCE WITH STATE AND FEDERAL LAWS

This Privacy Policy may not constitute your entire set of privacy rights, as such rights may vary for state to state. You may wish to contact the appropriate agency in your state that is charged with

overseeing consumer privacy rights. Certain regulations issued by state or federal government agencies may require us to maintain and report demographic information on the collective activities of our users. We may also be required to maintain your personal information for at least seven years in order to comply with applicable federal and state laws regarding recordkeeping, reporting, and/or audits.

## 10 COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)

When it comes to the collection of personal information from children under the age of 13 years old, the Children’s Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States’ consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children’s privacy and safety online.

We do not knowingly collect any personally identifiable information from anyone under the age of 18. We do not knowingly solicit information from or market to children under the age of 13. If we learn that we have inadvertently collected personal information from a child under the age of 13, we will delete that information as quickly as possible. If you become aware of any data we have collected from children under age 13, please contact us at [support@lendonate.com](mailto:support@lendonate.com).

## 11 CHANGES TO THIS POLICY

As user needs, technologies, and laws change, our website and its features may also change. This Privacy Policy may be updated periodically as such needs require. We will inform you of these changes by posting them on our website and/or by notifying you via email.

## 12 DEFINITIONS

Throughout the document several different words are used to convey the requirements of these policies and procedures. The common understanding of these words is given below:

- **Must, will, shall** – these terms denote a mandatory requirement that must be adhered to by all. The only allowable deviation is through a formal exception waiver.
- **Should** – this term denotes a highly suggested, but not mandatory, recommendation.
- **May, can** – these terms denote non-mandatory recommendations.

## 13 HOW TO CONTACT US

LENDonate, Inc.  
20830 Stevens Creek Blvd #1022  
Cupertino CA 95014

Email: [support@lendonate.com](mailto:support@lendonate.com)