

Privacy Statement

This Privacy Statement explains how NCD Financial, LLC ("NCD Financial" or "we") collects, uses, and shares information about individuals who do business with NCD Financial. For individuals who hold a layaway account ("Account") with us, we will use and share any information that we collect from or about you in accordance with this Privacy Statement.

What personal information do we collect? We obtain information about you ("personal information") when you provide it to us, such as by submitting Account application information and/or submitting your request to activate your Account. The types of information we collect may include, without limitation, your name, address, social security number, income information, and financial bank account information. We may supplement the information you provide to us with information about you that we collect from other sources, such as credit reporting agencies and providers of marketing information, which may furnish us with additional information about your identity, credit or payment history, purchasing preferences, and other matters.

How do we use personal information? We may use personal information for the following purposes:

- To deliver products and services to you.
- To respond to your inquiries and fulfill your requests;
- To send you important information, changes to our terms, conditions and policies and/or other such information;
- To send you marketing communications that we believe may be of interest to you
- To allow you to apply for one of our products, services, or programs;
- To verify your identity and/or location in order to access, service, and maintain your Account;
- To protect our business against risk of loss and fraud;
- To report to a credit bureau;
- For our other business purposes, such as product development, service improvements, data analysis, identification of usage trends, and determining the effectiveness of our promotional campaign; and
- To comply with laws and regulations and other legal process and law enforcement requirements.

With whom do we share personal information? We do not share your personal information with third parties except as indicated below:

- **Authorized Service Providers.** NCD Financial may share your personal information with our authorized service providers that perform certain services on our behalf in connection with your Account. These service providers may include, without limitation, financial service providers and fulfillment agencies. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purpose.
- **Trusted Third Parties.** We may also share Account information with other financial companies with whom we jointly offer products and services. Any such company with whom we share your information is required to adhere to similar privacy laws as us.
- **Other Situations.** We also may disclose your information: (i) in response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend our legal rights; to defend against legal claims; or as otherwise required by law; (ii) when believes disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; or to enforce our agreements or policies; and (iii) in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, asset sale or in the unlikely event of a bankruptcy.
- **Aggregated Information.** NCD Financial does share, rent or license aggregated information about you and other customers collectively and other non-personal information NCD Financial collects, at our own discretion.

How do we safeguard your personal information? We have implemented reasonable physical, electronic, and procedural safeguards to protect the personal information we have collected about you from unauthorized use,

misuse, disclosure, loss and alteration. You must understand, however, that we cannot guarantee the absolute security of your information, as no networked system or Internet transmission is totally secure. We assume no responsibility or liability if any information relating to you is intercepted and/or used by an unintended recipient.

How can you correct or update personal information we have collected about you? To access the personal information collected about you, to correct factual errors in such information, or to update our records with respect to your personal information, please contact us by the contact information provided below

How do I tell you about my privacy choices? You may contact us by the contact information provided below

What about joint accounts? Each person may separately make privacy choices, and joint account holders may make privacy choices for each other. If only one joint account holder makes a privacy choice, information about the other joint account holder may be shared.

Special Notice for Vermont Residents. In order to comply with Vermont law, we will not share information we collect about Vermont residents with companies outside our corporate family unless the law allows. For example, if we disclose information about you to other financial institutions with which we have joint marketing agreements, we will only disclose your name, contact information and information about your transactions.

Special Notice for California Residents. In order to comply with California law, the following applies if your account has a California mailing address. Even if you do not execute your privacy option as listed above, we will not share information that we have about you with non-financial companies outside our family of companies, unless otherwise permitted by law. We will not share information about you within, or with financial companies outside, our family of companies unless we first provide you with further privacy choices or unless permitted by law.

What choices do you have about information sharing? You may tell us not to share information about you with other companies outside of those companies involved with servicing your Account. Even if you do tell us not to share, we may do so as required or permitted by law, and if you have authorized us to share information in connection with that product or service.

YOUR CHOICES

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies.

NO, please do not share personal and financial information with your affiliated companies.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services.

NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

TIME SENSITIVE REPLY

You may make your privacy choice(s) at any time. Your choice(s) will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

To exercise your choices please contact us using any one of the options listed below.

Contact Information:

Mail: NCD Financial, LLC, 3911 N. Schreiber Way, Coeur d' Alene, ID 83815

Email: info@ncdfinancial.com

Phone: 800-654-6310