

## **Verdant Commercial Capital Privacy Policy**

*Effective date: January 20, 2022*

**Purpose:** In the course of our business activities, VCC must collect and process personal data of its customers, potential customers, suppliers, business associates, and employees. This policy, which is posted on VCC's website, describes how and why we process personal data and the measures we take to protect the privacy of the data subjects and remain compliant with relevant data protection laws.

**Scope:** This policy applies to Verdant Commercial Capital, LLC, and its subsidiaries.

### **Introduction**

Your privacy is important to Verdant Commercial Capital, LLC, and Intech Funding Corp., a division of Verdant Commercial Capital, (collectively "VCC" or "we" or "our"). This Policy explains what Personal Data we collect from you, why we collect and process your Personal Data, when and with whom your Personal Data is shared, and your rights with respect to your Personal Data.

In this Policy the term "Personal Data" means data that identifies or may be used to identify an individual person, including, but not limited to, a person's name, date of birth, job title, address, email, phone number, or employer.

In order to provide outstanding service, we must collect, maintain and process certain Personal Data about our customers, suppliers and other business contacts. We recognize and respect your privacy concerns and expectations about how we use this information. We want you to know about our privacy policies and practices, and what we do to protect your Personal Data.

### **Personal Data We Collect on our Website**

In general, you can visit VCC websites without telling us who you are and without giving any Personal Data about yourself. There are times, however, when we may need such information from you.

In all cases in which you submit personal information to us, you may tell us that you do not want us to use this information to make further contact with you beyond fulfilling your requests, and we will respect your wishes. If you give us personal information about someone else, such as a spouse, a reference, or a work colleague, we will assume that you have that person's permission to do so. In any case, we will only retain your Personal Data for as long as we have a legitimate and lawful reason to do so.

When you visit our websites, VCC may collect certain non-Personal Data by various means, one of which is "cookies." Cookies tell website operators to recognize your computer when you revisit a site. Cookies help to improve the use of the website. Cookies also allow Web sites to analyze aggregate traffic on the site, in order to streamline navigation and keep the content fresh for all visitors. The cookies we use do not contain Personal Data, nor can they read or transmit any data on your computer's hard drive. We do not use cookies to identify or track a user's activity outside of our websites. Regardless of cookies, all web-browsers transmit the IP address of the computer on which they are running. For most users accessing our websites from an Internet Service Provider

(ISP), the IP address will be different every time you log on. IP addresses may be used for various purposes, including to: (1) diagnose service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific Web company or ISP, (2) develop the most appropriate advertising based on geographic area or information derived from IP addresses, (3) estimate the total number of users visiting VCC from specific countries or regions of the world, (4) assist VCC to track visits to our Web site, and (5) help determine which users have access privileges to certain VCC Web site content.

### **Protecting your Confidential Information**

We take seriously our obligation to safeguard your confidential Information. Information is accessible only to employees who use it in order to provide products or services to you and your company and are held to standards of professionalism and integrity that includes using and disclosing customer data only for VCC's use in assessing your and your company's creditworthiness and providing you with the best products and services VCC offers. While no method of transmission over the Internet or electronic storage is 100% secure and we cannot guarantee its absolute security, we maintain physical, electronic, and procedural safeguards to protect the confidentiality of your information. When you enter sensitive information (such as a Social Security number) on our applications, we encrypt the transmission of that information using secure socket layer technology (SSL). If you have any questions about security on our website, you can contact us at [info@verdantcc.com](mailto:info@verdantcc.com).

### **Personal Data We Collect from Customers and Suppliers**

In order to carry out our business and to fulfill our contractual obligations, VCC must collect and process Personal Data of employees of prospective and existing customers or suppliers. Examples of the types of Personal Data that VCC may collect from its customers, suppliers and other business contacts are:

- Name, title, address, email, and telephone number
- Copies of driver's licenses or other government issued identification
- Tax identification numbers
- Signatures on legal contracts
- Payment information
- Financial statements or other financial information

### **Collecting Information**

We may gather confidential information from the following sources: information you provide on applications and through other forms, such as your name, address, social security number, ACH bank information, information from a credit reporting agency, such as creditworthiness and credit history to help us with customer authentication, payment processing and credit-related decisions, or data from your use of our website. When you visit our website, we automatically collect information on the type of device you use, operating system version, and the device identifier (or "UDID").

## **Why We Collect Personal Data**

VCC only collects Personal Data for lawful purposes. These include:

- To provide customers with our products or services
- To facilitate the approval of transactions
- To provide information on equipment leasing and finance
- To respond to requests from the customer, financier, or supplier
- To detect or prevent fraud
- To assess or manage risk
- To perform internal audits
- To comply with anti-terrorism, anti-bribery, or anti-money laundering laws or other laws
- To comply with legal process, subpoenas, or other requests from government bodies
- As part of a sale, merger, acquisition, or similar change of control
- To ensure data security

## **Our Data Protection Principles:**

VCC will treat your Personal Data as confidential. We respect your right to privacy. In all cases in which we collect your Personal Data according to this Policy, we will abide by the following principles:

- We will only collect your Personal Data with your full knowledge
- We will only collect and keep your Personal Data for a lawful purpose
- We will only keep that Personal Data which is necessary for the lawful purpose
- We will only keep your Personal Data for as long as the lawful purpose exists
- We will keep your Personal Data accurate to the extent it is reasonably practicable to do so
- We will store your Personal Data securely to prevent unauthorized or unnecessary disclosure
- We will process your Personal Data in accordance with your rights under the relevant data protection laws
- We will not transfer your Personal Data outside of its country of origin unless adequate protections are in place

## **Transfer or Sharing of Your Personal Data**

Subject to the above Data Protection Principles and the terms of any valid and fully executed non-disclosure agreement, VCC may transfer or share your personal data in the following circumstances:

1. Among our affiliates and wholly owned subsidiaries for the lawful purposes described in this Policy
2. To third parties such as our banks, financiers, couriers and suppliers in order to deliver our services or to fulfill or enforce a contract
3. To our attorneys, auditors, IT professionals or other third-party service providers for the lawful purposes described in this Policy
4. To the vendors and/or manufacturers of equipment and products that you have selected for acquisition and possession in connection with our financing and/or leasing of such equipment and products to you
5. To our funding partners in connection with any further assignment or syndication of a finance or lease contract
6. To government, regulatory, judicial or law enforcement bodies in response to official requests

VCC may also utilize cloud-based customer relationship management or IT service providers to store and process personal data. In all cases, VCC will take reasonable steps to ensure that adequate technical and organizational measures are in place so that the transfer and storage of your Personal Data is secure from unauthorized disclosure, alteration or deletion.

VCC does not sell, rent, or disclose your Personal Data to third parties for their own marketing purposes.

#### **Protecting Disclosure of Information to Non-Affiliated Third Parties.**

We do not share, sell, or lease personal information about you to any non-affiliated third parties for their marketing use. We may share information with other companies hired to provide services for us such as ordering credit bureaus, sending emails, and processing credit card payments. These companies – our vendors – are contractually bound to use personal information we share with them only to perform the services we have hired them to provide. We will release information about you if you direct us to do so, if we are required by law to do so, or in other legally limited circumstances (for example, to protect your account from fraud).

#### **Other Tracking Technologies**

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do link this automatically collected data to other information we collect about you.

Technologies such as: cookies, beacons, tags and scripts are used by VCC and our partners (Marketo, Pardot, INKY), affiliates, or analytics (Google Analytics, Microsoft Analytics) or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We also use mobile analytics software to allow us to better understand the functionality of our website on mobile devices. This software may record information such as how often you use the site, the events that occur within the site, aggregated usage, performance data, and where the mobile site was accessed from. We do not link the information we store within the analytics software to any personal information you submit within the mobile site.

We use Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.

We partner with a third party to either display advertising on our website or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests.

### **U.S. Patriot Act**

To help the United States government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions, including commercial lenders and entities extending credit, to obtain, verify, and record information that identifies each person and business that seeks a business loan or other extension of credit. What this means for you: When you apply for a loan, line of credit, or equipment financing, we will ask for your business name, address, and Tax Identification Number. We will also ask for your name, address, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents and will retain that documentation in compliance with federal laws and regulations.

### **Children**

VCC websites are not intended for visitors under 18 years of age. We do not knowingly solicit or collect personal data from or about children, nor do we knowingly market our products or services to children.

### **Notices and Revisions**

VCC may revise this privacy policy from time to time. You should periodically check the revision date at the top of this Web page to learn of any revisions.

### **Contact VCC**

To "opt out" or make other choices about your Personal Data or to exercise your rights, please email [info@verdantcc.com](mailto:info@verdantcc.com)