

## Online Privacy Policy

*Last Updated: January 1, 2025*

### **I. Introduction**

This Online Privacy Policy outlines and explains how YELO Funding Inc. (“YELO,” “we,” “us,” and “our”) collects, uses, shares, secures and eventually deletes Your Personal Information that is collected via YELO’s websites and mobile applications (collectively “Websites”). We respect Your privacy and are committed to protecting the Personal Information that You may share with us.

**By continuing to visit and use our Websites, You are agreeing to the terms of this Online Privacy Policy. If You do not agree, then please exit this Website and close Your browser.**

### **II. Definitions**

“Consumer” means a natural person that is a visitor and/or user of our Websites.

“Personal Information” means any information relating to an identified or identifiable individual that is collected via our Websites. Personal Information may include a Consumer’s full name, birthday, physical address, email address, IP address, or other identifier such as from a cookie.

Personal Information does not include any aggregate or anonymized data that may have been created from Personal Information but can no longer be used to identify, relate to, or could reasonably be linked to a Consumer.

“Sensitive Personal Information” means any data about a natural person that reveals a racial or ethnic origin, political opinion, religious belief, philosophical belief or trade union membership. It also includes a natural person’s genetic and biometric data, and data concerning their health, sex life or sexual orientation.

“Websites” (or the term individually) means yelofunding.com.

“You” or “Your” means a Consumer.

### **III. YELO’s Information Collection Practices Overview**

YELO offers students educational funding through an Income Contingent Financing (“ICF”). To provide these services, we may collect and process both personal and non-personal information from our customers. It is our policy to only obtain the Personal Information that is necessary to provide our services to You and to limit the access to consumer Personal Information to only those individuals who need it to serve our customers’ needs. We strive to provide the best service and

thus, certain information may also be used to maintain and improve our customer service to You. In general, we only disclose a customer's Personal Information to other professionals we work with when necessary to conduct business such as processing an application for an ICF, originating ICFs, or as required by law.

We apply these same general principles to visitors of our Websites. For visitors of our Websites, this Online Privacy Policy explains what information we may collect from You and how that information will be used.

#### **IV. Information Collected from You When You visit Our Websites**

We collect certain Personal Information from You in order to operate our Websites effectively and provide You with the best experiences when You visit and use them. We describe what information we collect and how we obtain it below.

- a. Information Provided by You:** When You apply for an ICF, register for an account with us online, we may collect certain Personal Information about You such as Your name, birthday, address, e-mail address, and telephone number.
- b. Information collected on Our Websites:** We also may use various technologies to collect information from Your computer or device and about Your activities on Our Websites.
  - i. Information collected automatically:** We may automatically collect information from You when You visit our Websites. This information may include Your IP address, location data, Your browser type and language, access times, the content of any undeleted cookies that Your browser previously accepted from us, referring or exit website address, internet service provider, date/time stamp, operating system, locale and language preferences, system configuration information, date and time of contact, internet service provider, Your operating system, Your screen resolution and colors, flash versions, and channels. We will also automatically collect information to determine whether You are a new user or returning visitor; the pages you visited on the site; how often, or for how long You visit portions of the site; terms you searched on our Websites; interactions with Website content such as button clicks, downloads, or playing videos; the last page you visit on our site; Your geolocation and set language; the branding, model, and marketing name used to identify Your device; and any other unique identifiers available to recognize You across Your devices. We also use Google Analytics and other third-party web analytics services such as Hotjar, to understand how You use YELO's Websites and to collect information about Your use of our Website as well. You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) by visiting: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt-out of Google Analytics by using the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. Our Websites' use and transfer

to any other website or application of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements. We also use Hotjar in order to better understand Your needs and to optimize this service and experience. Hotjar uses cookies and other technologies to collect data on our Consumer's behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. You can learn more about Hotjar by visiting: <https://help.hotjar.com/hc/en-us/sections/115003204947>.

- ii. Cookies:** When You visit our Websites, we may assign Your device one or more cookies to facilitate access to our site and to personalize Your online experience. Through the use of a cookie, we also may automatically collect information about Your online activity on our site, such as the web pages you visit, the links you click, and the searches you conduct on our site. Most browsers automatically accept cookies, but you can usually modify Your browser setting to decline cookies. Cookies are pieces of information stored directly on the computer you are using. YELO, or any of YELO's third-party advertising service providers, may place cookies or similar files on Your hard drive for security purposes, to facilitate site navigation and to personalize Your experience while visiting the YELO sites. Cookies allow YELO to collect technical and navigational information, such as browser type, time spent on its respective site and pages visited. Cookies allow YELO to select which of its advertisements or offers are most likely to appeal to you and display them while you are on YELO Websites. YELO may also use cookies in online advertising to track consumer responses to YELO advertisements and may use cookies or other files to track your use of other websites. Cookies and similar files do not contain or capture unencrypted personally identifiable data.

When you first visit our site, we provide You with a choice to either accept or deny certain cookies. If you do not accept these cookies, you may experience some inconvenience in your use of some online options. You also may not receive advertising or other offers from YELO that are relevant to your interests and needs. YELO uses web-browsing cookies to display information more effectively to you and to gather data about the usage of the YELO websites. Even if You choose to accept cookies, You are always free to change Your mind and revoke that consent.

- iii. Other technologies:** We may use standard Internet technology, such as web beacons, web server logs, and other similar technologies, to track Your use of our Websites. We also may include web beacons in promotional e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer to users of our Websites to deliver targeted advertisements and to measure the overall effectiveness of

our online advertising, content, programming, or other activities. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies, which are stored on your device, web beacons are embedded invisibly on the web pages (or in emails) and are about the size of the period at the end of this sentence. Web beacons may be used to deliver or communicate with cookies, to count visitors to certain pages, and to understand usage patterns. We also may receive an anonymous identification number if you come to our Websites from an online advertisement displayed on a third-party website.

## V. **Why We Collect Your Information**

- a. **To Service Our Websites:** We use information collected to ensure that our Websites are working as intended and for analytics purposes, to understand how our Websites are operating and learn how they can be improved. We also use this information as needed for auditing purposes as well.
- b. **For Marketing Purposes:** If You have filled out a contact form with us, we may use this information to send You marketing communications including emails, to offer our products and services to You. You can opt out of receiving these communications at any time by clicking the “opt out” link at the bottom of these emails.
- c. **To Evaluate and Improve our Customer Service:** We may use this Personal Information to ensure we are providing the highest level of customer service, and to identify any potential gaps or potential improvements to the same.
- d. **In Order to Respond to Requests from You:** If You have requested further information, applied for an ICF, or in any other way requested that we contact You, we will use Your Personal Information to respond to such a request.
- e. **For Our Legal Purposes:** We also collect Personal Information in order to comply with certain legal rules and regulations that we are subject to.

## VI. **Who We Share Your Personal Information With**

Generally, we share Your Personal Information as necessary to provide the services You request, including sharing information with certain third parties, such as service providers. We also may share Your Personal Information when required to by law; to protect Your rights and safety, and with Your consent. Specifically, we may share Your Personal Information with Third Parties, including:

- a. **Authorized service providers:** We may share Your Personal Information with our authorized service providers that perform certain services on our behalf. These services may include

relationship management software; website hosting; evaluators, contractors and auditors; email marketing providers; customer service providers; providers that perform business and operations analysis for us; and providers that support and maintain our Websites, including providing analytics services for us.

- b. State regulators and government entities:** Upon request or in connection with a legal reason, we may provide Your Personal Information to regulators and other governmental entities for investigations or other regulatory purposes.
- c. Our Advertising Partners:** We may also allow third parties through an advertising network to target custom content and ads to You on YELO Sites and other websites. The information provided to these service providers is limited to only that which YELO deems appropriate for these service providers to carry out their functions and enable YELO to market to you.
- d. For a Legal Reason:** We may have to share Your Personal Information 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 against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
- e. To Prevent Fraud or Illegal Conduct:** We may have to share Your Personal Information in situations where we believe 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 consumers, our employees, or others; or to enforce our terms of service or other agreements or policies.
- f. For Corporate Reasons:** We may also share Your Personal Information as part of a sale, merger, or change in control or ownership of YELO, or in the unlikely event of bankruptcy, or in preparation for any of these events. If such an event should happen, the new entity would have the right to continue to use Your information, but only in the manner that is set out in this Policy, unless You otherwise agree.
- g. With Your consent:** To other third parties that You provide us with Your consent to share your information with.

## **VII. How Long do We Store and Maintain Your Personal Information?**

We only store and maintain Your Personal Information for as long as is necessary to fulfill the purpose for which it was collected. For example, if You sign up to receive our alerts, we will store and maintain Your Personal Information to continue to send You these materials until You opt out of receiving such communications. With regards to Your Personal Information collected for our analytics purposes and used to help maintain and improve Our Websites, we only store and maintain that information until it is aggregated and used to create a new anonymous data set that

no longer contains Your Personal Information, and then delete the underlying Personal Information once that new data set has been created. If you are one of our valued customers or a claimant, we may need to maintain Your information longer as per legal obligations, as is outlined in our Privacy Notice.

### **VIII. Sale of Your Personal Information**

YELO does not generally sell any Personal Information that it has collected via our Websites to any third parties.

### **IX. Additional Information About Our Advertising Practices**

YELO advertises on pages within the YELO Websites as well as on other websites, social media sites, and mobile applications not affiliated with YELO. YELO may contract with other companies to advertise to You through the use of cookies and web beacons.

As noted above, the information collected through cookies and web beacons includes the number of people who look at each of the pages on the YELO Sites, search engine referrals, browsing patterns within the YELO Sites, and responses to advertisements and promotions on the YELO Sites. Information collected may also include other trends and activity on the YELO Sites, basic information about whether you have visited the sites before, your Internet connection and computer settings, such as your browser, your IP address and your time zone.

YELO also contracts with other companies to advertise YELO's accounts and services on websites not affiliated with YELO. If you click on one of YELO's ads, you link to the particular YELO website that offers the advertised service. These ads may contain cookies that allow tracking of your response to the YELO's advertisements. These cookies do not identify you personally.

### **X. Links to Other Sites**

YELO may provide links to other companies, such as government sites, credit bureaus or merchants. These links are provided as a courtesy and YELO does not endorse, control, provide, or manage any content, including related privacy controls on any other website. Our connection to those sites is not and should not be considered an endorsement by YELO of the products or services found on those sites. When You use these links to go from our Websites to another website, You do so at Your own risk. If You choose to link to websites not controlled by YELO, YELO is not responsible for the privacy or security of these sites, including the accuracy, completeness, reliability or suitability of their information. If You are asked to provide information on one of these websites, You are strongly urged to carefully study their privacy policies before sharing your information.

## **XI. Children's Personal Information**

YELO does not knowingly market to or solicit information from children under 16 without parental consent. Our Websites, products and services are not geared for nor marketed to Children under the age of 16. If You are under the age of 16 years old, You should not be visiting or using this Website.

## **XII. How You can Opt Out**

You may choose to opt out of direct marketing by YELO at any time. You may also limit the contact from YELO. You may opt out of the following:

- Telephone Calls from YELO
- Email from YELO

To opt out, please contact YELO as follows:

- To opt out of our Advertising Network:** You can opt out of YELO Websites sharing your information with an advertising network to target custom content and ads to you on YELO Websites and other websites.
- To Unsubscribe from YELO Emails:** If you no longer wish to receive emails from YELO, you may cancel the service by replying to the sender with the word "unsubscribe" in the subject line of the e-mail, or by using the unsubscribe link in the e-mails you receive from us.
- To opt out of Marketing Phone Calls:** Email [info@yelofunding.com](mailto:info@yelofunding.com). Please include your full name and the phone number associated with your request. We may not be able to process your request without this information.

## **XIII. Third-Party Tracking on Our Websites**

Third-parties may be using Cookies or other technologies to collect Your Personal Information as You navigate through the internet including from our Websites. As described above, You may decline these third-party cookies by changing Your browser settings.

## **XIV. Do Not Track ("DNT") Signals**

Although various internet browsers offer an option (usually in the browser preferences) to send a signal to websites you visit asking the site not to track your actions, YELO does not have the ability to respond to DNT signals.

## **XV. Updates to Our Privacy Policy**

From time to time, we may update this Online Privacy Policy. If we do, we will note near the top of this page the date that any changes are made and/or when they become effective. If the changes

being made are material, we may alert you to the changes in a more prominent way. By using our Websites after these changes are made, you agree to the revised version of the Online Privacy Policy.

#### **XVI. How to Contact Us**

If you have questions or concerns about this Privacy Policy, or if you would like to inform YELO about changes in your personal information (such as your address), you may communicate that to us by emailing [info@yelofunding.com](mailto:info@yelofunding.com).