

Rayo App Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY. THIS POLICY DESCRIBES THE WAYS Nium, INC. D/B/A Rayo ("Rayo", "we", "us", "our") OR OUR VENDORS OR PARTNERS COLLECT, PROTECT, USE AND STORE YOUR PERSONAL INFORMATION. YOU ACCEPT THIS PRIVACY POLICY BY USING OUR PRODUCTS AND SERVICES ON OUR WEBSITE OR THROUGH ANY OTHER MEANS (COLLECTIVELY THE "SERVICES"). We may amend this Privacy Policy at any time by posting a revised version on our website. We will give a reasonable notice period upon making any changes; however, unless otherwise stated, the revised version will be effective at the time we post it.

This Privacy Notice Policy describes the types of personal information we collect on the Sites, how we may use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices.

1. How Rayo collects your information

1.1. Information you give Rayo

If you open an account or use the Rayo Services, whether directly, through a merchant partner, or a third-party platform, we may collect the following types of information:

- Personal information - your name, date of birth, identification number, address, phone, email, third-party application IDs, and other similar information.
- Financial information - bank account numbers that you link to your Rayo account or give us when you use the Services.
- Before permitting you to use the Services, we may require you to provide certain information, including but not limited to your date

of birth and identification number. We may use this information or other information you provide to verify your identity.

- Username and password you create to access our products and services online.
- Information about legal work eligibility status, and other information relevant to our products or specific jobs for which you may apply; or
- Other personal and business information you may provide to us.

1.2. Information Rayo learns from your Use

When you visit the Rayo website, Rayo App or use the Services, we may collect information sent to us by your computer, mobile phone or any other device. This information may include your IP address, device information including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as your browser type, traffic to and from our site, the pages you accessed on our website, and any other available information. We may also collect information about your use and interaction with our website, application or the Services. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity that may affect the availability of the Services. When you use the Services, we may also store information based on your usage history. This includes, but is not limited to, details of your transactions, content you viewed, event information, click stream information, and cookies that may uniquely identify your browser or your account. We may also collect information about you from any contact you have with any of our services or employees, such as, with our customer support team, in surveys, or through interactions with our partners.

1.3. Cookies and other tracking technologies

We use various technologies to collect and store information when you use the Services, and this may include sending one or more cookies or device identifiers. We also use these tracking technologies when you interact with the services we offer to our partners, such as advertising services or Rayo features that may appear on other sites and in any

other manner that we deem necessary for our business purposes, such as:

- **Site operations:** Enabling features that are necessary for providing you the Services on our site, such as identifying you as being signed in, tracking content views, remembering your preferences, and the number of times you have been shown an advertisement.
- **Analytics:** Allowing us to understand how our Services are being used, track site performance, and make improvements.
- **Personalized advertising:** Delivering tailored advertising based on your preferences or interests across services and devices, and measuring the effectiveness of advertisements.

You can learn more about ad-serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#). Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting out of advertising networks services does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. Note that if you delete your cookies, you may also delete your opt-out preferences. Additionally, without cookies, you may not be able to use all of the features of our Services.

1.4. Information obtained from third parties

If you apply for an account with Rayo, we will obtain information about you from third parties such as identity verification services related to you. This information will be obtained at the time of your application, periodically throughout the lifetime of your Rayo account, as well as in

connection with the use of any other services that we offer or that you may obtain from us (including the Rayo Marketplace).

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization. By associating an account managed by a third party with your Rayo account and authorizing Rayo to have access to this information, you agree that Rayo may collect, store and use this information in accordance with this Privacy Policy.

2. How Rayo protects your information

2.1. Safety policies

Rayo stores and processes your information maintaining physical, electronic and procedural safeguards. We maintain physical security measures to guard against unauthorized access to systems and use safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings, and we authorize access to personal information only for those employees or agents who require it to fulfill the responsibilities of their jobs.

3. How Rayo uses your information

3.1. To improve our service

Rayo uses information to perform and improve our services, contact you, conduct research, and provide anonymous reporting for clients. For example, we may use information to provide customer service and support, process transactions, resolve disputes, collect payments, prevent illegal activities, customize the Services, reduce risk to all parties involved in our transactions, and verify the accuracy of information.

3.2. To provide relevant marketing to you

We may use information to deliver targeted marketing, service update notices, and promotional offers based on your communication preferences. We may combine your information with information we

collect from other companies and use it to improve and personalize the Services, content, and advertising.

4. How Rayo shares your information.

4.1. For our everyday business purposes

We share your personal information with employees, vendors, partners, bank partners, marketing providers, and third parties as required to offer the Rayo Service. This includes, but is not limited to, processing transactions, maintaining your account, offering other financial services, responding to court orders and legal investigations, litigation purposes and complying with audits or other investigations. We also engage the following types of service providers to perform functions on our behalf: marketing or billing providers, auditing and accounting firms, professional services consultants, providers of analytics services, security vendors, and IT vendors. Occasionally, these service providers may also collect data directly from you and their privacy policies may also apply.

4.2. When required by law

We will share your information with any party when required by law or by a government request to do so or to combat fraud or criminal activity.

5. What are your options?

5.1 Notifications

If you no longer wish to receive marketing notifications about Rayo's products and services, you may change your notification preferences by emailing support@rayo.com. Alternatively, a customer can indicate their preference by logging into the Rayo App and adjusting the marketing preferences or by following the directions provided with the communication.

- *5.2 SMS messaging*
- You can opt out of receiving SMS messages by emailing support@rayo.com. Alternatively, a customer can indicate their preference by logging into your account and adjusting your

preferences or by following the directions provided with the communication.

5.3 Access your information

You can review and edit your personal information at any time by logging in to your account or by contacting us at support@rayo.com. You can also request to close your account by contacting us at support@rayo.com. If you close your Rayo account, we will mark your account in our database as "Closed," but will keep your account information in our database to comply with our legal and regulatory obligations. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. If you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law or in accordance with this Privacy Policy.

6. California consumers

6.1 Your California privacy rights

Persons with disabilities may obtain this notice in alternative format upon request by contacting us at support@rayo.com.

California Shine the Light: Residents of the State of California have the right to request information from Rayo regarding other companies to whom the company has disclosed certain categories of information during the preceding year for the other companies' direct marketing purposes. If you are a California resident and would like to make such a request, email support@rayo.com.

California Consumer Privacy Act: The California Consumer Privacy Act ("CCPA") provides California residents with the right to receive certain disclosures regarding the collection, use, and sharing of "Personal Information," as well as the right to know/access, delete, and limit sharing of Personal Information. The CCPA defines "Personal Information" to mean "information that identifies, relates to, describes, is

reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household." Certain information we collect may be exempt from the CCPA because it is considered public information (e.g., it is made available by a government entity) or covered by a specific federal privacy law, such as the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

To the extent that we collect Personal Information that is subject to the CCPA, that information, our practices, and your rights are described below.

Right to notice at collection regarding the categories of personal information collected

You have the right to receive notice of the categories of Personal Information we collect, and the purposes for which those categories of Personal Information will be used. This notice should be provided at or before the time of collection. The categories we use to describe the information are those enumerated in the CCPA.

- **Personal identifiers:**

- We collect your name, phone number, and email address and contact address when you create an account or complete a transaction. If you choose to create an account, you will also be asked to create a username, and we will assign one or more unique identifiers to your profile. We use this information to provide the Services, respond to your requests, and send information and advertisements to you.
- We collect bank account information when you provide it to us, when you complete a transaction. You have the option to store this information to your account or set up a recurring transaction. We use this information to streamline and facilitate payments and transactions.
- We may collect your identification number or identification document number (e.g. Driver's License or Passport). We use this information to identify you, authenticate and collate

information about you, prevent fraud, and conduct background checks or other screening activities.

- We collect your IP address automatically when you use our Services. We use this information to identify you, gauge online activity on our website, measure the effectiveness of online services, applications, and tools, and to serve targeted advertisements based on your online activities.
- We collect your Device ID automatically when you use our Services. We use this information to monitor your use, and the effectiveness of, our Services, to identify you, and to provide you with targeted information and offers.
- **Protected classifications:** We collect your age in order to comply with laws that restrict collection and disclosure of personal information belonging to minors.
- **Commercial information:** When you engage in transactions with us, we create records of goods or services purchased or considered, as well as purchasing or consuming histories or tendencies. We use this information to measure the effectiveness of our Services and to provide you with targeted information, advertisements, and offers.
- **Biometric information:** We collect information about your physiological, biological, and behavioral characteristics. We use this information to verify your identity.
- **Internet or other electronic network activity information:** We collect information about your browsing history, search history, interaction with websites, and applications or advertisements automatically when you utilize our Services. We use this information to gauge online activity on our website, measure the effectiveness of online services, applications, and tools, and to serve targeted advertisements based on your online activities
- **Geolocation data:** As described above, we collect your IP address automatically when you use our Services. We may be able to determine your general location based on your device's IP address. When you use the Services for the first time, we may ask for your permission to collect your precise location (i.e., your GPS coordinates). If you allow your device to provide us with this information, we use it to make improvements to our products and

services, and to provide recommendations and deliver relevant advertising.

- **Audio, electronic, visual, or similar information:** If you contact us via phone, we may record the call. We will notify you if a call is being recorded at the beginning of the call. We may collect your photographic or video image, or similar information. We use this information to monitor our customer service, maintain the security of our systems and physical locations, and train employees.
- **Professional or employment-related information:** We may collect information about your current employer and your employment history. We use this information to conduct background and other screening activities, and to promote our services to others.
- **Inferences drawn to create a profile about a consumer reflecting the consumer's preferences or characteristics:** We may analyze your actual or likely preferences through a series of computer processes. On some occasions, we may add our observations to your internal profile. We use this information to gauge and develop our marketing activities, measure the appeal and effectiveness of our Services, applications, and tools, and to provide you with targeted information, advertisements, and offers.

We may use any of the categories of information listed above for other business or operational purposes compatible with the context in which the Personal Information was collected.

We may share any of the above-listed information with Service Providers, which are companies that we engage for business purposes to conduct activities on our behalf. Service Providers are restricted from using Personal Information for any purpose that is not related to our engagement. The categories of Service Providers with whom we share information and the services they provide are described in this Privacy Policy.

Right to know about personal information collected, disclosed, or sold

You have the right to request that we disclose to you the Personal Information we collect, use, disclose, or sell. In order to process your request to know/access your Personal Information or delete your

Personal Information we may ask you to take additional steps to verify your request or identity.

Verification procedures

In order to process your request to know about or delete personal information we collect, disclose, or sell, we must verify your request. We do this by:

- Providing personal identifiers, we can match against information we may have collected from you previously, and
- Asking you to confirm your request using the email address and/or telephone account stated in the request.

If you have authorized someone else to make requests on your behalf, we will require that you provide notarized statements confirming the identity and authority of that person. Such notarized statements can be obtained by emailing support@rayo.com.

Right to know/access information

You have the right to request access to Personal Information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. To protect our customers' Personal Information, we are required to verify your identify before we can act on your request.

Right to request deletion of information

You have the right to request in certain circumstances that we delete any Personal Information that we have collected directly from you. To protect our customers' Personal Information, we are required to verify your identity before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Right to information regarding participation in data sharing for financial incentives

You have the right to be free from discrimination based on your exercise of your CCPA rights. We may run promotions from time to time wherein we incentivize a consumer to share certain pieces of information with us. Participation in these incentives is voluntary, and you may opt out of the data sharing at any time.

Right to opt out of sale of personal information to third parties

Though Rayo does not sell Personal Information to third parties, California law requires that we maintain a separate webpage that allows you to opt out of the sale of your Personal Information in the future, which can be accessed by visiting our "[Do not sell my info](#)" webpage or by calling us at support@rayo.com.

Please note that your right to opt out does not apply to our sharing of Personal Information with service providers, who are parties we engage to perform a function on our behalf and are contractually obligated to use the Personal Information only for that function.

We may also disclose information to other entities when required by law or to protect Rayo or other persons, as described in our Privacy Policy.

How to submit a request

You may submit a request to exercise your rights through the following means:

- By visiting where you can request and download specific pieces of information we have collected. By signing in to your account to submit the request, you will be able to automatically verify your identity, which will result in faster processing of your request.

Authorized agent

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We require that you and the individual complete notarized affidavits in order to verify the identity of the

authorized agent and confirm that you have authorized them to act on your behalf.

8. Nevada residents

8.1 Special information for Nevada residents

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. Rayo does not sell the Personal Information of its customers. However, if you are a Nevada resident and would like to make such a request, please email support@rayo.com.

9. GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the

provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- Request access to Your Personal Data. The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- Request correction of the Personal Data that We hold about You. You have the right to to have any incomplete or inaccurate information We hold about You corrected.
- Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- Request erasure of Your Personal Data. You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- Request the transfer of Your Personal Data. We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.

- Withdraw Your consent. You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

10. Contact Rayo

10.1 Contact Rayo

If you have questions or concerns regarding this Privacy Policy, you can contact Rayo at support@rayo.com.

Facts	What does Rayo 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

	<p>the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and employment information • Payment history • Transaction history, assets, and account balances <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	<p>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 Rayo chooses to share; and whether you can limit this sharing.</p>	
Reasons we can share your personal information	Does Rayo share?	Can you limit this sharing?
<p>For our everyday business purposes--such as to process your transactions, maintain your account(s), offer or service loans or lines of credit, offer other financial services, respond to court orders and legal investigations, or report to credit bureaus</p>	Yes	No
<p>For our marketing purposes--to offer our products and services to you</p>	Yes	Yes
<p>For joint marketing with other financial companies</p>	Yes	Yes

For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	Yes
For our affiliates' everyday business purposes – information about your creditworthiness	No	No
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	No
To Limit Our Sharing	<p>You may limit our sharing by emailing support@rayo.com and request to edit your Personalized Services preferences.</p> <p>Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice, or earlier if you consent or as permitted by law. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>	

Questions? Email support@rayo.com

Who we are	
Who is providing this notice?	Rayo
What we do	
How does Rayo 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 Rayo collect my personal information?	We collect your personal information, for example, when

	<p>you</p> <ul style="list-style-type: none"> • Apply for a loan or open an account • Provide account information or pay your bills • Use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<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. See below for more on your rights under state law.</p>
<p>Definitions</p>	
<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p>

	<ul style="list-style-type: none"> • Rayo does share with our affiliates.
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 can share with include our merchant partners, third-party platforms, and marketing service providers.
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"> • Rayo doesn't jointly market.
Other important information	
<p>Special Notice For State Residents</p> <p>For California Residents. We will not share personal information with affiliates or nonaffiliates except as permitted by California law, such as to process your transaction or with your consent.</p> <p>For Vermont Residents. We will not share personal information with affiliates or nonaffiliates except as permitted by Vermont law, such as to process your transaction or with your consent.</p>	