



## BILLFLOAT, INC. DOING BUSINESS AS SMARTBIZ LOANS PRIVACY NOTICE

SmartBiz Loans recognizes, respects and protects the personal privacy rights of all its users. We are committed to providing security and privacy regarding the collection and use of our customer information, as well as the personal information of all consumers who visit our institution.

The following Privacy Policy explains how we use and protect the information about our customers. We ask that you read it carefully.

FACTS	WHAT DOES SMARTBIZ LOANS 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?	<p>The types of information we collect and share can include:</p> <p><b>Personal Information about Business Owners, Employees who manage day-to-day operations, Officers, and Directors</b></p> <ul style="list-style-type: none"> <li>• names of owners and ownership percentages</li> <li>• contact details</li> <li>• birth date</li> <li>• social security numbers</li> <li>• valid driver’s license or passport information</li> <li>• information about criminal history</li> <li>• whether liquid assets exceed \$100,000</li> <li>• past defaults on government-related loans</li> <li>• credit report and credit score</li> <li>• citizenship</li> </ul> <p><b>Business Information</b></p> <ul style="list-style-type: none"> <li>• Name and formation history</li> <li>• Past and current financial performance</li> <li>• Loan history</li> <li>• Management team information</li> <li>• Competitive positioning</li> <li>• Business licenses and certificates</li> <li>• Tax transcripts</li> <li>• Credit history</li> <li>• Bank account information and transaction history</li> </ul> <p>When you are no longer our customer, we may continue to share your</p>

	information as described in this notice.
<b>How?</b>	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons SmartBiz Loans chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SmartBiz Loans share?	Can you limit this sharing?
<b>For our business purposes –</b> such as to determine which lenders are appropriate for your business, to refer you to lenders, and to prepare you loan applications	<b>YES</b>	<b>NO</b>
<b>For our marketing purposes –</b> to offer our products and services to you	<b>YES</b>	<b>NO</b>
<b>For joint marketing with other financial companies</b> to offer products and services to you	<b>YES</b>	<b>YES</b>
<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	<b>NO</b>	<b>We don't share</b>
<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	<b>NO</b>	<b>We don't share</b>
<b>For our affiliates to market to you</b>	<b>NO</b>	<b>We don't share</b>
<b>For non-affiliates to market to you</b> to offer relevant small business financial products and services to you.	<b>YES</b>	<b>YES</b>

<b>Questions?</b>	Call 866-283-8726 or go to <a href="http://www.smartbizloans.com">www.smartbizloans.com</a>
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What we do	
<b>How does SmartBiz Loans protect my personal information?</b>	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.
<b>How does SmartBiz Loans collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ Open a SmartBiz account</li> <li>▪ Utilize SmartBiz to apply for small business loan</li> <li>▪ Permit us to gather third party data to support your loan application</li> </ul>

<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ Sharing with affiliates' for their everyday business purposes – information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> <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>
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<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ SmartBiz Loans has no affiliates.</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ Non-affiliates we share with can include financial services companies, service providers, tax preparers, retailers and direct marketing companies.</li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ Our joint marketing partners might include financial services companies.</li> </ul>

<b>Other important information –</b>
<p>SmartBiz Loans is committed to fully complying with the laws and regulations, such as the Fair Credit Reporting Act, The Right to Financial Privacy Act, and the California Financial Information Privacy Act (Chapter 241, Statutes of 2003) which became law on July 1, 2004 as “Division 1.2” of the Financial Code (sections 4050 et seq.) that have been established to protect the confidentiality of customer information. For individual principal shareholders, officers, and directors, if we obtain and use information from a third party, other than the government, such as a consumer report, we will notify you. You are entitled to request credit reporting agencies to remove your name from lists supplied to us. All of our operations and data processing systems are in a secure environment that protects your account from being accessed by third parties. You may elect to provide us with personal information through the use of E-mail. We continue to monitor and review the privacy measures that we have in place to protect customer information. These measures are updated as practices change and new technology becomes available.</p>
<p>Do Not Call Policy. This Privacy Policy constitutes SmartBiz Loans’s Do Not Call Policy under the Telephone Consumer Protection Act for all consumers. SmartBiz Loans maintains an internal Do Not Call preference list. Do Not Call requests will be honored within 30 days and will be effective for at least five years from the date of request. No telemarketing calls will be made to residential or cellular phone numbers that appear on the SmartBiz Loans Do Not Call list.</p>
<p>Nevada residents: We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by following the directions in the To limit direct marketing section. For more information contact us at support@smartbizloans.com, or SmartBiz Loans at support@billfloat.com. Or contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; 702-486-3132; <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.</p>
<p>Vermont Residents: Except as permitted by law, we will not share information we collect about you with non-affiliates or affiliates unless we have first requested your permission and you authorize us to do so.</p>
<p>California Residents: Under California law, we will not share information we collect about you with non-affiliates or joint marketing partners, unless the law allows. For example, we may share information with your consent, to find a lender for your business or prepare a loan application for you. We will limit sharing to the extent required by</p>

California law.

By electronically signing your consent to this Privacy Policy, you are consenting to the disclosure to nonaffiliated third parties of nonpublic personal information pertaining to the Applicant and its principal shareholders, officers, and directors.

Your consent to this Privacy Policy will remain in effect until you revoke or modify it. We will be unable to provide you SmartBiz loan referral and packaging services if you opt-out.

You may revoke your consent at any time by contacting us by telephone at 866-283-8726.