

NFS Leasing, Inc. Privacy Policy

Revised: December 17, 2020

NFS Leasing, Inc. (“**NFS Leasing**,” “**we**,” “**us**” or “**our**”) is committed to protecting your privacy and the personal information you entrust us with.

Our privacy policy is designed to protect you and explains how we give you control over your personal information.

We carefully manage your personal information and we never sell or share your personal information with non-affiliated outside parties other than what is stated in this Privacy Policy.

This Privacy Policy applies to information gathered through the website at www.nfsleasing.com, gathered through any of our mobile applications (individually, a “**Site**,” collectively, the “**Sites**”) and gathered through providing any of our Services (defined below). This Privacy Policy describes how we use Personal Information (defined below), how we secure that data, our data retention policies, information about your rights and choices, and how you can contact NFS Leasing regarding our privacy practices. Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it.

By using our Site and Services, you expressly give your consent for the collection and use of your Personal Information in compliance with this Privacy Policy.

If you do not agree with our policies and practices, your choice is not to use our Site and/or Services. This Policy may change from time to time (see Updates to This Privacy Policy). Your continued use of this Site and our Services after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

When we use the term, “**Personal Information**,” we mean information or data that directly or indirectly identifies, describes, relates to or is reasonably capable of being associated with or can reasonably link to a particular individual, consumer or household.

When we use the term “**Service(s)**” we mean, collectively:

- The provision of our equipment leasing services, financing services and/or related services to our customers and clients (together, “**Customer(s)**”);
- The information provided through our Sites; and
- Our marketing and business development activities including, without limitation, any social media properties we create and emails that we send (collectively, “**Marketing Activities**”).

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HOW WE COLLECT YOUR PERSONAL INFORMATION

We may collect your Personal Information through different means, when you:

- Apply for our Services and provide us with information directly;
- Decide to interact with us, either by providing us your information through the “Contact Us” page on the Site or by email, regular mail, or telephone;
- Visit our Site, through automated data tracking technology; or
- Authorize third parties to provide us Personal Information.

It is up to you whether you want to provide us with information or authorize third parties to provide us with information. When we ask you to provide information, you can decline and still visit the Site to learn more about us and what we do. However, if you choose not to provide information to us, we may be unable to provide you our Services. This Privacy Policy does not apply to any third-party sites that may link to or be accessible from the Sites.

TYPES OF PERSONAL INFORMATION WE COLLECT

We may collect the following types of Personal Information:

Types of Information You May Provide to Us:

- Name, alias, physical address, email address, postal address, telephone numbers, communication preferences, unique personal or online identifier, account name, employer, job title, date of birth;
- Information that you authorize third parties to release to us;
- Financial information;
- Real estate or personal property information;
- Social Security number (SSN), driver’s license or passport number;
- Job title, job history;
- Persistent or probabilistic identifiers that organizations use to identify a particular consumer; and
- Records of your correspondence with us, including support correspondence.

You may provide us with additional information through other locations on our Sites, including without limitation, the “Contact Us” page on our Site or if you reply to our invitation to “Tell us your story,” on the “Contact Us” page. We may receive Personal Information relating to other people from Affiliates (defined below) and non-affiliated third-party service providers. If you submit any Personal Information to us relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy. By submitting Personal Information, you grant NFS Leasing the right to transmit, monitor, retrieve, store and use your information in connection with the operation of the Site.

Types of Information We Collect Through Technology: When you use our Site, we use technology and Google Analytics to gather information on how visitors are using the Site and Services. Specifically, we use technology to gather information about the following:

- IP addresses
- Device
- Internet connection
- Browser version
- Time zone
- Operating system and platform
- Referring/exit pages
- Account access date/time stamp
- Cookie data previously stored on your device

An IP address is a number automatically assigned to your computer whenever you access the Internet. IP addresses allow computers (including mobile devices and tablets) and servers to recognize and communicate with one another. We collect IP address information so that we can properly manage our system and gather information about how our site is being used. This includes the device type and browser you are using, location data, the pages you are viewing and your interactions on the page. Your IP address may be associated with records containing

Personal Information. We collect details of visits to our Site, including the volume of traffic received, logs and the resources that you have accessed. We may also collect certain location information such as your mobile device's GPS signal, or information about nearby WiFi access points and cell towers. (Please also see our "[Cookies Notice](#)".)

Types of Information We Collect from Third Parties: Our Affiliates (defined below) may submit (or cause to be submitted) Personal Information to us, which may include names, aliases, physical addresses, social security #'s, license numbers, signatures, telephone numbers, insurance policy information, education and employment background, bank accounts, credit cards, dates of birth and other financial information. Our Business Partners may submit analytics, enhancing data and customer leads. When we use the term, "**Affiliate(s)**" we mean an independent third party with whom we do business, including without limitation, leasing and financing brokers, equipment vendors, dealers, and manufacturers; referral agencies; financial and lending institutions; as well as any entity that we directly or indirectly, control, or are controlled by, or are under common control with.

HOW AND WHY WE USE YOUR INFORMATION

We only collect the information reasonably necessary to respond to inquiries about our Services, to provide you the Services, to carry out our operations, as required by law, and for the other legitimate business purposes, under applicable laws, as provided below:

- To inform you about the Services in which you have indicated an interest or to which you've subscribed; respond to your questions and requests and improve customer service; to provide you with notices about your account and/or subscription, including expiration and renewal notices;
- To assist in business development and general marketing and building relationships; to create a list of actual and prospective users and Customers; to compile statistics regarding how the Site is used in order to improve our products and Services;
- To record your name and contact information, and other Personal Information for legitimate business purposes, so that we can provide our Services;
- To authorize and manage access to the Site;
- To offer our Services;
- To perform our contract with you if you become a Customer or authorized user; satisfy contractual necessity to conduct our operations and provide you with the services and products we offer; to perform essential business operations and to manage your account; to contact you with information that may be of interest to you;
- To improve the Site to provide you with better services, for example, we may use your personal data to improve the layout of our Site based on the click path you utilized to access certain information within the Site;
- To comply with legal obligations and professional responsibilities;
- To verify your identity or conduct internal audits or reviews; and

- To detect or prevent security incidents or other illegal activity; debug; verify or maintain quality or safety or improve or upgrade a service or device owned or controlled by us.

We do not monitor or profile our customers or visitors to our Site or collect, in any automated manner, any special categories of sensitive Personal Information about you. No automated decision-making, including profiling, is used when processing your Personal Information.

Additional Uses of Personal Information:

In addition to the uses described above, we may use your Personal Information for the following purposes if you become a Customer or authorized user. Some of these uses may, under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, or are necessary to serve our legitimate interests in the following business operations:

- Providing you with newsletters, articles, alerts and announcements, and other information that we believe may be of interest to you;
- Providing you with marketing information about our services and;
- Conducting research, surveys, and similar inquiries to help us understand our Customers' needs;
- Analyzing your interactions with us and our Site, and improving our products, services, programs, and other offerings;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our Site or data systems; meeting legal obligations; and
- Enforcing our agreements.

HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

We may disclose aggregated information that does not identify any individual (and therefore, is not deemed to be Personal Information) without restriction. We share Personal Information with the following categories of recipients:

Affiliates/Third-party Vendors: Your Personal Information will only be shared with and processed by our Affiliates and non-affiliated third-party service providers as permitted by law and for the purposes described in this Privacy Policy. We may disclose Personal Information to certain non-affiliated specialized service providers, including professional advisors, consultants, insurers, accountants, lenders, banks, technical service providers, and other third parties, who are to use it only for the purposes for which we disclose it to them. We may disclose your Personal Information to third-party service providers to provide us with services such as Site hosting, including information technology and telephony services, and related infrastructure, customer service, e-mail delivery, auditing and other similar services.

Business Transfers: When applicable, we may share your information in connection with a substantial corporate transaction, such as the sale of a Site, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.

With Your Consent or at Your Direction: We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent or direction.

Other Legal Reasons: In addition, we may use or disclose your Personal Information as we deem necessary or appropriate: (1) under applicable law; (2) to respond to requests from public and government authorities including public and government authorities; (3) to pursue available remedies or limit damages we may sustain; (4) to protect our operations or those of any of our Affiliates; (5) to protect the rights, privacy, safety or property of NFS Leasing, our Affiliates, you and others; and (6) to enforce our agreements, terms and conditions.

We keep Personal Information on file and except as otherwise provided for herein, do not share, sell, license or transmit this information to third parties or external vendors unless required to do so by legal, judicial or governmental proceedings, or to provide the Services requested.

INFORMATION SECURITY FOR PROTECTION OF YOUR PERSONAL INFORMATION

We use reasonable organizational, technical and administrative measures to maintain the privacy and security of your Personal Information within our organization. Accordingly, we prevent unauthorized access by a secure firewall and use of security technologies to protect the integrity and privacy of any Personal Information you provide. Although we work hard to protect your Personal Information, NFS Leasing cannot guarantee the security of any information you transmit to us through online forms and applications, and you do so at your own risk. The Site is not designed to store sensitive personal information such as financial, health or educational records and you should not use the site for that purpose. Please note that email is considered a nonencrypted (and therefore nonsecure) form of communication, and it can be accessed and viewed by others without your knowledge and permission. For that reason, to protect your privacy, please do not use email to communicate information that you consider confidential. Unfortunately, no data transmission or storage system can be guaranteed to be secure at all times. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “How to Contact Us” section below. We will let you know promptly if a breach occurs that may have compromised the privacy or security of your information.

RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy and in order to provide you the Services, and for as long as your account is active or as needed to provide you Services. We will also retain your information to comply with our legal obligations, to conduct audits, resolve disputes, and to enforce our agreements.

CAPACITY / CHILDREN

This Site is only intended for individuals who are at least 16 years of age. We do not knowingly encourage or solicit visitors to this Site who are under the age of 16 or knowingly collect Personal Information from anyone under the age of 16 without parental fiduciary consent. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us in accordance with the "How to Contact Us" section below.

We are committed to complying with the Children's Online Privacy Protection Act (COPPA). Our Service is not directed to children under the age of 13 and children under the age of 13 are not to use the Site or provide any information to our Service without express parental consent. We do not knowingly collect personal information from children under the age of 13. If we receive personal information that we discover was provided by a child under the age of 13, we will promptly destroy such information.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see *YOUR CALIFORNIA PRIVACY RIGHTS* for more information.

FINANCIAL INFORMATION

NFS Leasing uses the financial information that you provide directly to us, or that you direct third parties to provide to us. We use and may share such information with our Affiliates and third-party vendors to provide our Services to you.

E-MAIL MARKETING

We may periodically send you marketing communications and alerts by e-mail. To help improve our Marketing Activities, we often receive a confirmation when you open an e-mail or click on a link included in one of these emails, if your computer supports such capabilities. If you prefer not to receive these marketing email communications and alerts, instructions on how to unsubscribe from these communications and alerts are included in each e-mail.

YOUR PERSONAL INFORMATION CHOICES

You have choices in how your Personal Information is used and shared. You have the right to:

- Request that we update, access, and delete your account information; Choose whether you wish to receive promotional and newsletter communications; and
- Choose whether you wish to share Personal Information with and use NFS Leasing integrations.

How to Request Deletion of Personal Information and Certain Exceptions to Deletion Request Rights: You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your

verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform or enforce our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Choice and Opt-Out:

- We provide you the opportunity to “opt-out” of having your Personal Information used in for certain purposes and instances. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included in each newsletter or communication or by contacting us as provided in the section titled, “How to Contact Us,” below.
- You may opt out of personalized ads anytime by deleting your browser's Cookies. For more information, please review our [Cookies Notice](#) below.

Exercising Access, Data Portability and Deletion Rights: To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us as provided in the section titled, “How to Contact Us,” below.

Verification of Your Identity: Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may make a verifiable consumer request for access or data portability twice within a 12-month period. You must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

WITHDRAWAL OF YOUR CONSENT

Where you have provided consent to process personal information, you have the right to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. You may do this by contacting us as set forth in the "How to Contact Us" section below.

RESPONSE TIMING AND FORMAT

We endeavor to respond to a verifiable consumer request within thirty (30) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

COOKIES NOTICE

What are Cookies and why are Cookies used: A "Cookie" is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While Cookies are often only used to measure website usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience of a website by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.

How we use Cookies: We use Cookies and related technologies to provide Services, gather information when users navigate through the Sites to enhance and personalize the experience, to understand usage patterns, and to improve our Sites, products, and Services.

Cookies on our Sites are generally divided into the following categories:

Necessary Cookies. These Cookies are necessary to provide you with our Services and to use some of their features, such as access to secure areas. Because these Cookies are strictly necessary to deliver the Services, you cannot refuse them without impacting how our Services function. These Cookies do not collect identifying information about you, and they do not monitor or remember any of your internet browsing on sites other than NFS Leasing's Site.

Google Analytics. This Site uses Google Analytics. Google Analytics uses Cookies to help us to analyze how users use the Site. It counts the number of visitors and tells us things about their behavior in the aggregate – for example, we can see which user guides are most popular or see how many people visit a particular page. Google Analytics does not associate your IP address with any other data held by Google. You may see how Google uses data when you use this Site at www.google.com/policies/privacy/partners.

How to Control Cookies: You can review your Internet browser settings, typically under the sections "Help" or "Internet Options," to exercise choices you have for certain Cookies. If you choose to block all Cookies, you may not have access to our Site and our Services will not function as intended. If you have blocked all Cookies and wish to make full use of the Services we offer, we recommend enabling at least first-party Cookies. Rather than blocking all Cookies, you can choose to block only third-party Cookies. To learn more about the use of Cookies by Google for analytics see <https://policies.google.com/technologies/cookies>. To exercise choice regarding those Cookies, please see the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout>. The opt-outs described above are device- and browser-specific and may not work on all devices.

YOUR CALIFORNIA PRIVACY RIGHTS

To the extent that the California Consumer Privacy Act (CCPA) applies to us and to you, you have the following rights:

- Right to Know: You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices;
- Right to Request Deletion: You have the right to request that we delete your Personal Information that we have collected from you; and
- Right to Non-Discrimination: We will not discriminate against you for exercising any of these rights.

To exercise your "right to know" or your "right to request deletion," please contact us as provided in the section titled, "How to Contact Us," below.

Please note that to protect your information and the integrity of our Services, we may need to verify your identity before processing your request. In some cases, we may need to collect additional information to verify your identity, such as a government issued ID.

In general, you should expect to receive a response within 45 days of the date we receive your request. Under the CCPA, you are limited to two requests during any 12-month period. Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent's identity.

As of January 1, 2020, under the California Consumer Privacy Act (CCPA), California Residents have the right to request the following information from NFS Leasing by emailing websupport@nfsleasing.com and NFS Leasing will provide the following information to you upon verification of your identity:

- The categories of Personal Information NFS Leasing collects about you;
- The categories of sources from which your Personal Information is collected;
- The business purpose for collecting your Personal Information;
- The categories of third parties with whom NFS Leasing shares your Personal Information; and
- The specific pieces of Personal Information NFS Leasing has collected about you.

In addition, please check the following sections of this Privacy Policy: *TYPES OF PERSONAL INFORMATION WE COLLECT, HOW AND WHY WE USE YOUR INFORMATION, and HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION.*

You may opt out of any marketing by us and from the disclosure of your Personal Information to third parties.

Personal Information Sales Opt-Out And Opt-In Rights: If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers whom we actually know are less than 16 years of age, or any consumer.

Non-Discrimination: If you elect to exercise any of your rights under CCPA, NFS Leasing will not discriminate against you for exercising any of your CCPA rights. Unless otherwise permitted by the CCPA, we will not: deny you goods or services, charge you a different price or rate for our goods or services, or provide you a different level or quality of goods or services because you exercised such rights. Under the current definition of CCPA, NFS Leasing does not sell your Personal Information.

Other than as provided above, we may offer you certain financial incentives, as permitted by the CCPA, in exchange for your giving us certain information, which incentives may result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Types of Information We Have Collected in the Past Twelve (12) Months:

In particular, we have collected the following categories of personal information, from Customers, authorized users, and visitors to our Sites, within the last twelve (12) months:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, dates of birth, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	National origin, citizenship, marital status, medical condition, physical or mental disability, sex (or gender identity), veteran or military status.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
G. Geolocation data.	Physical location or movements of leased equipment.
I. Professional or employment-related information.	Current or past job history or performance evaluations.

RESIDENTS OF THE EUROPEAN ECONOMIC AREA

Your personal information will be treated in a secure and confidential manner in compliance with all applicable laws and regulations, including the European General Data Protection Regulation (“GDPR”). Depending on the context in which personal information is provided, NFS Leasing may be the data processor (“processor”) or data controller (“controller”) of your personal information. In most instances, NFS Leasing is a processor of personal information submitted to the Site or collected through the Site on behalf of or at the direction of our Customers. The Data Subject owns the data submitted to the Service. If the Customer requests that NFS Leasing remove the personal information, we will respond to the request within 30 days.

If you have any questions or concerns regarding this Privacy Policy or our privacy practices, including the processing of your Personal Information, if you would like to exercise your data rights under applicable laws, or if you believe your privacy rights have been violated, please contact us as provided in the section "How to Contact Us" below.

LINKS TO OTHER SITES

Occasionally we may provide links to other sites for your convenience and information. These sites operate independently from our Sites and are not under our control. These sites may have their own privacy notices or terms of use, which you should review if you visit any sites linked through our Sites. We are not responsible for the content or use of these unrelated sites.

UPDATES TO THIS PRIVACY POLICY

NFS Leasing may change its Privacy Policy from time to time, and at NFS Leasing's sole discretion. NFS Leasing encourages visitors to frequently check this page for any changes to its Privacy Policy.

HOW TO CONTACT US

If you have any queries, questions or concerns about this Privacy Policy or our Personal Information handling practices, please contact us at info@nfsleasing.com or write to us at NFS Leasing, Inc., 900 Cummings Center Suite 226-U, Beverly, MA 01915 or by telephone at 866-970-4637 (U.S. or Canada only).