# Flex Privacy Notice

(Last updated December 26, 2025)

| | |
|---|---|
| **Facts** | **What does Flexible Finance, Inc. and its affiliates and subsidiaries (collectively, "Flex") 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 the product or service you have with us. This information can include:<br><br>• Social Security number and income<br>• Account balances and payment history<br>• Credit history and credit scores<br><br>When you are no longer our customer, we continue to share your information as described in this notice. |
| **How?** | 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 Flex chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Flex share? | Can you limit this sharing? |
|---|---|---|
| **For <u>our</u> everyday business purposes—** such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus, or as otherwise permitted by law | Yes | No |
| **For <u>our</u> marketing purposes—** to offer our products and services to you | Yes | No |

| | | |
|---|---|---|
| **For joint marketing with other financial companies** | Yes | No |
| **For our affiliates' everyday business purposes—** information about your transactions and experiences | Yes | No |
| **For our affiliates' everyday business purposes—** information about your creditworthiness | No | We don't share |
| **For our affiliates to market to you** | No | We don't share |
| **For nonaffiliates to market to you** | No | We don't share |

| | |
|---|---|
| **Question?** | Call 888-205-9407, email privacy@getflex.com, or go to https://help.getflex.com/hc/en-us. |

| **Who we are** | |
|---|---|
| **Who is providing this notice?** | This privacy notice is provided by Flex. |

| **What we do** | |
|---|---|
| **How does Flex 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.<br><br>We restrict our employees' access to your information so that it is only accessible when they need it to do their work, and we require companies that work for us to protect your information. |
| **How does Flex collect my personal information?** | We collect your personal information, for example, when you:<br><br>• provide us your contact information |

| | |
|---|---|
| | • open an account, provide account information, login to your Flex account, or use Flex services<br>• link your bank account, credit, or debit card to your Flex account<br><br>We also collect your personal information from others, such as credit bureaus, affiliates, property management companies, property management software companies, or other companies. |
| **Why can't I limit all sharing?** | Federal law gives you the right to limit only:<br><br>• sharing for affiliates' everyday business purposes—information about your creditworthiness<br>• affiliates from using your information to market to you<br>• sharing for nonaffiliates to market to you<br><br>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law. |

| **Definitions** | |
|---|---|
| **Affiliates** | Companies related by common ownership or control. They can be financial and nonfinancial service providers. Our affiliates include others, such as:<br><br>• Flexible Finance, Inc.<br>• Flexible Finance Servicing, Inc.<br>• Flexible Finance Brokering, Inc.<br>• Flexible Finance Payments, LLC<br>• Flexible Finance Lending, LLC<br>• Flexible Finance SPV I, LLC<br>• Flexible Finance SPV II, LLC<br>• Flexible Finance SPV III, LLC<br>• Flexible Finance SPV IV, LLC<br>• Flexible Finance SPV V, LLC<br>• Flex Receivable Purchaser SPV, LLC |
| **Nonaffiliates** | Companies not related by common ownership or control. They can be financial and nonfinancial service providers. |

| | |
|---|---|
| | Nonaffiliates that we share personal information include vendors that perform services or functions on our behalf, and include credit bureaus, banks, security vendors, and data management vendors. |
| **Joint Marketing** | A formal agreement between nonaffiliated financial companies that together market financial products or services to you.<br><br>Our joint marketing partners include banks. |

## Other important information

**California Residents**: The California Consumer Act of 2018, as amended by the California Privacy Rights Act (collectively, the "Act"), permits consumers who are California residents to ask businesses covered under the Act about personal data it has collected about the consumer, submit an access or deletion request, and opt out of the sale of personal information, if applicable. These provisions do not apply to personal information collected, processed, shared, or disclosed by financial institutions pursuant to the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act. We will not share personal information that we collect about you with nonaffiliated third parties without your authorization except as permitted by law.

**North Dakota Residents**: We will not share your information with nonaffiliated third parties, except for our everyday business purposes, for marketing our products and services to you or for joint marketing, with your consent (as required), or as otherwise permitted by law.

**Vermont Residents**: We will not share your information with nonaffiliated third parties, except for our everyday business purposes, for marketing our products and services to you, with your consent (as required), or as otherwise permitted by law. We will not disclose creditworthiness information about you within or outside the Flex group except as permitted by law, unless we otherwise obtain your consent.

Rev. May 2025

# FACTS WHAT DOES COLUMN, N.A. 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 the product or service you have with us. This information can include:<br>■ Social Security number and account balances<br>■ Transaction history and payment history<br>■ Credit history and income |
| **How?** | 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 Column, N.A. chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Column, N.A. share? | Can you limit this sharing? |
|---|---|---|
| **For our everyday business purposes—** such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| **For our marketing purposes—** to offer our products and services to you | Yes | No |
| **For joint marketing with other financial companies** | Yes | No |
| **For our affiliates' everyday business purposes—** information about your transactions and experiences | No | We don't share |
| **For our affiliates' everyday business purposes—** information about your creditworthiness | No | We don't share |
| **For our affiliates to market to you** | No | We don't share |
| **For nonaffiliates to market to you** | No | We don't share |

| | |
|---|---|
| **Questions?** | Call (415) 702-2703 or go to questions.column.com |

| Who we are | |
|---|---|
| **Who is providing this notice?** | This notice is provided by Column, N.A. |

| What we do | |
|---|---|
| **How does Column, N.A. 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 Column, N.A. collect my personal information?** | We collect your personal information, for example, when you:<br>■ Open an account or give us your contact information<br>■ use your credit or debit card or pay your bills<br>■ tell us where to send the money<br>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies. |
| **Why can't I limit all sharing?** | Federal law gives you the right to limit only:<br>■ sharing for affiliates' everyday business purposes—information about your creditworthiness<br>■ affiliates from using your information to market to you<br>■ sharing for nonaffiliates to market to you<br>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law. |

| Definitions | |
|---|---|
| **Affiliates** | Companies related by common ownership or control. They can be financial and nonfinancial companies.<br>■ Column N.A. does not share with our affiliates. |
| **Nonaffiliates** | Companies not related by common ownership or control. They can be financial and nonfinancial companies.<br>■ *Column, N.A. does not share with nonaffiliates so they can market to you.* |
| **Joint marketing** | A formal agreement between nonaffiliated financial companies that together market financial products or services to you.<br>■ *Column, N.A.'s joint marketing partners include nonaffiliated financial institutions with which various banking, securities or insurance products and services may be offered.* |

| Other important information |
|---|
| **For California residents:** We will not share information we collect about you with nonaffiliates, except as permitted by law, including with your consent or to service your account.<br><br>**For Vermont residents:** We will not share information we collect about you with nonaffiliates, except as permitted by law, including with your consent or to service your account. |

# Your Privacy Rights

Rev. August 1, 2024

## Introduction

Welcome to Lead Bank!

We work hard to protect your personal information and ensure your information is kept private and secure. The following privacy policy outlines the types of personal information that Lead Bank (“Lead Bank”) collects through our websites and services. It also explains why we collect your information and how we use it.

Privacy is important to Lead Bank. We will never rent or sell your information to anyone. If you have any questions or if you believe that Lead Bank has not adhered to this privacy policy, please send us a note at clientsupport@lead.bank. We reserve the right to amend this privacy policy at our discretion and at any time.

## Table of Contents


**U.S. Consumer Privacy Notice**

1. What does Lead Bank do with your personal information?
2. How does Lead Bank use and share your personal information?
3. Who we are
4. What we do
5. Definitions
6. Other important information

**U.S. State Mandated Privacy Notice at Collection**

1. Your Privacy Choices and Rights
2. Exercising Your Privacy Choices and Rights
3. Non-Discrimination
4. California Specific Notices
5. Changes to Our U.S. State Mandated Privacy Notice at Collection
6. Contact Information

# U.S. Consumer Privacy Notice

| | |
|---|---|
| **Facts** | **What does Lead Bank 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 the product or service you have with us. This information can include:<br><br>● Social Security number and account transactions<br>● Checking account information and credit history<br>● Payment history and account balances<br><br>When you are no longer our customer, we continue to retain and share your information as described in this notice. |
| **How?** | 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 Lead Bank chooses to share; and whether you can limit this sharing. |

**How does Lead Bank use and share your personal information?**

| Reasons we can share your personal information | Does Lead Bank share? | Can you limit this sharing? |
|---|---|---|
| **For our everyday business purposes–** such as to process your transactions, maintain, your account(s), respond to court orders and legal investigations, or report to credit bureau**s** | Yes | No |
| **For our marketing purposes—** to offer our products and services to you | Yes | No |

| | | |
|---|---|---|
| **For joint marketing with other financial companies** | Yes | No |
| **For our affiliates' everyday business purposes—** information about your transactions and experiences | No | We don't share |
| **For our affiliates' everyday business purposes—** information about your creditworthiness | No | We don't share |
| **For affiliates to market to you** | No | We don't share |
| **For nonaffiliates to market to you** | No | We don't share |

| | |
|---|---|
| **Questions?** | • Call 866-845-9545—our menu will prompt you through your choices<br>• Go to www.lead.bank<br>• Email clientsupport@lead.bank |

| **Who we are** | |
|---|---|
| **Who is providing this notice?** | Lead Bank. |

| **What we do** | |
|---|---|
| **How does Lead Bank 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. We authorize our employees to get your information only when they need it to do their work, and we require companies that work for us to protect your information. |
| **How does Lead Bank collect my** | We collect your personal information, for example, when you<br>• Apply for a loan or open an account |

| | |
|---|---|
| **personal information?** | • Show your government-issued ID or use your credit or debit card<br>• Provide employment information<br><br>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies. See below for more information on your rights under state law. |
| **Why can't I limit all sharing?** | Federal law gives you the right to limit only:<br><br>• Sharing for affiliates' everyday business purposes—information about your creditworthiness<br>• Affiliates from using your information to market to you<br>• Sharing for nonaffiliates to market to you<br><br>You should be aware that Lead Bank does not collect or share information for these purposes.<br><br>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law. |

| **Definitions** | |
|---|---|
| **Affiliates** | Companies related by common ownership or control. They can be financial and nonfinancial companies.<br><br>• *Our affiliates include others, such as Luna Parent, Inc.* |
| **Nonaffiliates** | Companies not related by common ownership or control. They can be financial and nonfinancial companies.<br><br>• *Lead Bank does not share with non-affiliates so they can market to you.* |
| **Joint marketing** | A formal agreement between non-affiliated financial companies that together market financial products or services to you.<br><br>• *Our joint marketing partners include Third Party Financial Service platforms for credit cards, loans, and other banking services* |

| Other important information |
| --- |
| Lead Bank is chartered under the laws of the State of Missouri and is subject to regulatory oversight by the FDIC. Any consumer wishing to file a complaint against Lead Bank should contact the FDIC though one of the following means: In person, by U.S. Mail: 1100 Walnut Street; Suite 2100; Kansas City, MO 64106, by Telephone (800) 209-7459, or Online at: https://ask.fdic.gov/FDICCustomerAssistanceForm<br><br>Several U.S. states, including California, have enacted or will soon enact consumer privacy laws that grant their residents certain rights and require additional disclosures. If you are a resident of California or one of these states, you may have rights granted under the applicable state law. Learn more about your privacy rights.<br><br>**VT**: Accounts with a Vermont mailing address are automatically treated as if they have limited the sharing as described above. For joint marketing, we will only disclose your name, contact information and information about your transactions.<br><br>**NV**: We are providing you this notice pursuant to Nevada law.<br>For more information, contact us at 866-845-9545, or email clientsupport@lead.bank, with "Nevada Annual Notice" in the subject line. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1–702–486–3132; email BCPINFO@ag.state.nv.us.<br><br>**CA**: Accounts with a California mailing address are automatically treated as if they have limited the sharing with nonaffiliates as described above. If you are a California resident and would like to exercise additional choices over your data, please click here. |

# U.S. State Mandated Privacy Notice at Collection

Several U.S. states, including California, have enacted or will soon enact consumer privacy laws that grant their residents certain rights and require additional disclosures (collectively, “State Privacy Laws”). If you are a resident of one of these states, this section applies to you and supplements the information contained in Lead Bank’s Privacy Policy.

As explained in our Privacy Policy, both federal and state laws require us to tell you how we collect, use, share, and protect your personal information. As a result, our data

collection practices are generally governed by federal law, including the Gramm-Leach-Bliley Act (“GLBA”). However, certain information collected may be out of scope of federal laws and instead covered by State Privacy Laws. Under the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”) of 2020 and other California laws (collectively, the “CCPA”), this may also include information about employees and employee applicants as well as enterprise data (such as business-to-business).

This notice is intended to provide information required under State Privacy Laws, including the CCPA. This notice applies to the data collection and processing practices of Lead Bank (collectively, “Lead Bank” or “we”).

We do not and will not sell consumer personal information in the traditional and colloquial sense of the word sale. We do not use advertising technology on our website, which under some State Privacy Laws may be considered a “sale” or “share” of your information. In the preceding twelve (12) months, we have not “sold” or “shared” consumers’ personal information, as defined under State Privacy Laws. We do not engage in targeted advertising.

We also do not offer financial incentives, preferential service agreements, or any other differences in our prices or services in exchange for your data.

**Your Privacy Choices and Rights**

Under the State Privacy Laws, you may have the following rights, including the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and disclose and access your personal information, including receive the information in a portable format, (2) request deletion of your personal information, (3) request correction of inaccurate personal information, (4) request to limit the use and disclosure of sensitive personal information, and (5) not be discriminated against for exercising these rights (“Data Subject Requests”).

This section describes consumers’ rights under the State Privacy Laws and explains how you can exercise those rights with Lead Bank.

**Right to Delete**

Under certain State Privacy Laws, 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 verify your Data Subject Requests, we will delete your personal information from our records (and direct our service providers to delete your personal information from their records), unless an exception applies.

Certain personal information that we collect and use to provide you with financial services, and which Lead Bank is obligated by federal law and/or regulations to retain, cannot be deleted upon request.

We also may deny your Data Subject Requests to delete if retaining the information is necessary for us or our service providers to:

- Detect security incidents;
- Protect against malicious, deceptive, fraudulent, or illegal activity;
- Assist law enforcement in prosecuting those responsible for such activities; or
- Comply with a legal obligation.

**Right to Correction**

Under certain State Privacy Laws, you have the right to request that we correct any inaccuracies about your personal information. If we provide you with financial services, you can do so through our application.

**Right to Know/Right to Access and Data Portability Rights**

Under certain State Privacy Laws, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we confirm your Data Subject Request, we will disclose to you, upon specific request:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, disclosing, or sharing that personal information.
- The categories of third parties with whom we disclose that personal information.
- The categories of personal information we disclosed or sold to each category of third party.
- The specific pieces of personal information we collected about you.

**Right to Limit Use and Disclosure of Sensitive Personal Information**

You have the right to request that we limit the use and disclosure of sensitive personal information to the services we provide to you. Lead Bank's current practice is to use the sensitive personal information it collects only for the purpose of providing you with the financial services we offer.

## Exercising Your Privacy Choices and Rights

If you are a resident of a state that provides the above rights under State Privacy Laws, you may exercise the rights above by:

- By email: clientsupport@lead.bank
- By phone: (800) 209-7459

Each Data Subject Request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We will make every effort to verify your identity using your email address, but we may request additional information. If an authorized representative is making the request on your behalf, we require documentation showing that the representative has such authority.
- Describe your Data Subject Request with sufficient detail that allows us to properly evaluate and respond to it.

We cannot respond to your Data Subject Request or provide you with personal information if we are unable to verify your identity, or unable to verify the authority for the person making the request as your agent. We will use personal information provided in a verifiable consumer Data Subject Request to verify your identity or authority to make the Data Subject Request, and not for any other purpose.

You may only make a verifiable Data Subject Request for access or data portability twice within a 12-month period.

## Response Timing and Format

We will acknowledge your Data Subject Request within 10 days. We attempt to respond to every Data Subject Request within 45 days. If we require more time, we will inform you of the reason and how much additional time we require (up to 90 days in total). Any disclosures we provide may only cover the 12-month period preceding the Data Subject Request's receipt. If we are unable to satisfy your Data Subject Request, or a part of your Data Subject Request, we will explain why.

We do not charge a fee to process or respond to Data Subject Requests.

## Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or who is registered with the applicable Secretary of State to act on your behalf, or to whom you have provided power of attorney pursuant to applicable laws, ("Authorized Agent"), may

make a verifiable consumer request to access, port, correct, or delete your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an Authorized Agent make a request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent, and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

**Non-Discrimination**

We will not discriminate against you for exercising any of your rights. Unless permitted by the State Privacy Laws, we will not:

- Deny you services.
- Charge you different prices for our services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of service.

**California Specific Notices**

If you are a California resident, California Civil Code Section 1798.83 permits you to request a list of all third parties to which we, during the immediately preceding calendar year, have disclosed certain personally identifiable information for direct marketing purposes. In the preceding calendar year, we have not disclosed personally identifiable information for direct marketing purposes.

We are only required to respond to a customer request for this list once during any calendar year. To make such a request, please see above under the section “Exercising Your Privacy Choices and Rights.” Please be aware that not all information sharing is covered by the California privacy rights requirements and only information sharing that is covered will be included in our response.

During the last twelve (12) months, we have collected personal information in the following categories from consumers and disclosed personal information with the following categories of recipients. Although the list contains examples of information collected, we do not collect every specific piece of personal information for every consumer:

| Category of Personal Information | Examples of Personal Information Collected | Categories of Recipients |
|---|---|---|
| Identifiers | Name, address, email address, phone number, account identifiers, online identifiers, IP address, Social Security number, or other similar identifiers. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| California customer records or similar information in states with applicable privacy laws | Name, signature, Social Security number, address, telephone number, driver's license or state identification card number, employment, employment history, bank account number, and other financial information.<br><br>This category may overlap with other categories. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| Characteristics of protected classifications under state or federal law | Age, marital status, or gender. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| Commercial information | Purchasing or consuming histories or tendencies. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |

| | | |
|---|---|---|
| Internet or other similar network activity | Information on a consumer's interaction with our website, applications, or advertisements. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| Professional or employment-related information | Current occupation. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| Inferences | Inferences drawn from any of the information listed above to create a profile about you, such as a profile that reflects your preferences, characteristics, behavior, and attitudes. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |
| Sensitive Personal Information | Government-issued identifiers (such as Social Security number and driver's license), financial account numbers in combination with login credentials, and facial images used for identification. | Our affiliates, service providers, third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. |

We collect personal information for the business and commercial purposes and uses described in the Privacy Policy section titled "What does Lead Bank do with your personal information?"

In addition to the sources described above, we collect personal information from the following categories of sources:

- Directly from our clients or their agents,
- Indirectly from our clients or their agents, in the course of the services that we provide,
- Directly and indirectly from activity on our website, and
- Other third-party sources, including government sources.
- From third parties that interact with us in connection with the services we perform.

The retention periods for data elements within each category listed above vary depending on the nature of the data element and the purposes for which it is collected and used. Our retention period for the data elements within each category is set based on the following criteria: (1) the length of time that the data is needed for the purposes for which it was created or collected, (2) the length of time the data is needed for other operational or record retention purposes, (3) the length of time the data is needed in connection with our legal, compliance and regulatory requirements, for legal defense purposes and to comply with legal holds, (4) how the data is stored, (5) whether the data is needed for security purposes and fraud prevention, and (6) whether the data is needed to ensure the continuity of our products and services.

**Changes to Our U.S. State Mandated Privacy Notice at Collection**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make material changes to this privacy notice, we will notify you by email, by notice on this site, or by other acceptable means.

**Contact Information**

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under State Privacy Laws, please do not hesitate to contact us.

By email: clientsupport@lead.bank

By phone: 866-845-9545