

Stride Funding Privacy Policy

LAST UPDATED: JULY 17, 2023

I. Purpose

This Privacy Policy (the "Policy") describes how Stride Funding Inc., along with its subsidiaries and affiliates (collectively, "Stride") collects, receives and shares information about customers ("you") from our website and any off-line communications we may have with you. This Privacy Policy, together with our Terms of Use govern your use of our website and our collection and use of your information.

BY USING THE SITE, YOU AGREE TO THE COLLECTION AND USE OF INFORMATION IN ACCORDANCE WITH THIS POLICY.

II. Stride's business

Stride makes outcomes-based funding options available for eligible students pursuing bachelor's or master's degrees, or certi cations with eligible education providers. Loan products vary by school and issuer. Loans may be issued by Stride Funding, Inc. or FinWise Bank, a Utah-chartered commercial bank, Member FDIC. All loans are subject to individual approval and adherence to underwriting guidelines. Program restrictions, other terms, and conditions apply. Deferred Tuition Agreements (DTAs) are originated on behalf of educational institutions.

III. How we collect your information on this website

Stride collects the following information from students and other visitors to our website:



- Information you provide on our website such as contact information, school affiliation or feedback.
- Basic traffic information about your visit such as IP address, host name and pages on our site visited.
- ISA or DTA application information such as name, contact information, requested funding amount, social security number, income, credit history, and assets loan decisions.
- Existing loan information such as existing balances and loan servicer information.

We also use third parties to gather your data from financial institutions. By using our service, you grant our third-party provider the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution according to the terms of our third-party provider's privacy policy.

We do not collect personally identifiable information from website visitors who do not voluntarily submit such information. However, information collected from prior visits could be associated with personally identifiable information if you later submit such information to us.

If you create an account on our website, we will collect information from you, including:

- Name
- Email Address
- Phone Number
- Educational Institution
- Program of Study or Major
- Graduation Date Requested
- Funding Amount

By using our site and voluntarily submitting such information, you consent to Stride sharing all such information, inclusive of our underwriting and funding decisions with non-affiliated third parties, along with strategic partners of Stride, including, but not limited to, a partner bank. We use data security measures that comply with federal law and all applicable regulations. These measures include computer safeguards and secured files and buildings.

IV. Our use of cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

V. Our use of Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this.

VI. How we use information collected from visitors to this website

We use information collected from website visitors to improve the content and browsing experience of our website, to provide information regarding our products to you, and respond to you. From time to time, Stride may share your information with non-affiliated third parties for marketing purposes, and we may contact you with marketing offers. Stride may disclose information collected from website visitors to:

- Trusted services providers who work on our behalf, who do not have independent use of the information we disclose to them, and who have agreed to adhere to the rules set forth in the privacy statement.
- Alert you to new features, products, events, or services.
- Third party service providers and/or joint marketing partners to allow us to make other marketing offers that we think may be of interest of you.
- Third parties as required by law, such as to comply with a subpoena or similar legal process.

- Third parties as we deem necessary, based on our good faith belief, (i) to protect our rights, your safety or the safety of others, (ii) to investigate fraud, or (iii) to respond to a government request.
- Third parties in conjunction with a merger, acquisition or sale of Stride.

This website also uses Google AdWords as a third party remarketing service to advertise across the internet to previous visitors of our website. Third-party remarketing services including Google, will use cookies and pixel tags (action tags) on your web browser to collect non-identifiable information about your visits and interaction with our website and display advertisements based on these past visits. The advertisements could be in the form of an advertisement on a Google search results page, a site in the Google Display Network, a banner or link. You can set preferences for how Google advertises to you using the Google Ad Settings page or opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page. If you want to you can opt-out page of interest-based advertising entirely by changing your cookie settings or permanently using a browser plugin.

VII. Children and Privacy

This website is not intended for use by children. If you are under 18, you may use this website only with the involvement of a parent or guardian. If you are a parent or guardian and believe that we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to <u>support@stridefunding.com</u>.

VIII. Opt-out

You may choose to opt-out of receiving unrequested communications by clicking "unsubscribe" of a given communication or by emailing .

IX. Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, administrative, and technical safeguards to protect the information we collect and maintain. If you notice a vulnerability, please let us know by emailing

X. Your Consent

By using our website, you consent to the collection, processing and storage of information as described in this Policy. Processing activities may take place in the United States. If you reside outside of the United States, your information may be transferred to, and processed and stored in, the United States or other jurisdictions in accordance with applicable law in that jurisdiction. If you do not agree to these terms, do not use this website.

XI. California Customers

If you are a resident of California, please refer to our Notice of California Consumer Privacy Act of 2018 ("CCPA") Privacy Rights Policy.

XII. Vermont Customers

We will not disclose nonpublic personal financial information about you to nonaffiliated third parties (other than as permitted by law) unless you authorize us to make that disclosure. Your authorization must be in writing or, if you agree, in electronic form

XIII. Notice of Privacy Rights

Customers may access, review and/or correct all their personally identifiable information that we collect online by sending an email to <u>support@stridefunding.com</u> with a subject heading "Customer Choice Privacy Notice," and allow thirty (30) days for a response.

Stride Funding, Inc. PO Box 961750 Boston, MA 02196

XIV. Contact Us

If you have any questions about this Privacy Policy, please contact us at <u>support@stridefunding.com</u>.

XV. Adjustments to the Plan

This Privacy Policy is effective as of January 31, 2021 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the website after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

Notice of California Consumer Privacy Act of 2018 ("CCPA")

Privacy Rights

LAST UPDATED: APRIL 26, 2020

I. Applicability

This section applies to California residents only.

II. Stride's Practices Regarding Consumers' Personal Information

Notice at Collection:

- Category of personal information: Identifiers such as a real name; alias; postal address; unique personal identifiers such as application and loan numbers; email address; telephone number; social security number; driver's license number or passport number; or other similar identifiers, and Professional or employmentrelated information.
 - Business or commercial purpose for which collected: To provide you with financial products and services, as well as employer benefits related to student loans and higher education financing.

- Category of personal information: Anonymized internet or other electronic network activity information including information regarding a consumer's interaction with an Internet Web site, application, or advertisement such as cookies and marketing pixels.
 - Business or commercial purpose for which collected: To market products and services that may be of interest to you.

<u>Personal Information Collected: Stride has collected the following categories of</u> <u>personal information in the preceding 12 months:</u>

- Category of personal information: Identifiers such as a real name; alias; postal address; unique personal identifiers such as application and loan numbers; email address; telephone number; social security number; driver's license number or passport number; or other similar identifiers, and Professional or employmentrelated information.
 - Business or commercial purpose for which collected: To provide you with financial products and services, as well as employer benefits related to student loans and higher education financing.
 - Categories of sources from which this personal information was collected: From you directly, from other financial institutions, and from your employer, as applicable.
 - Categories of third parties with whom we share this personal information: Service providers; third parties as required by law such as to comply with a subpoena or similar legal process; third parties as we may deem necessary based on our good faith belief to protect our rights, your safety and the safety of others and to investigate fraud and respond to government requests, and third parties in conjunction with a merger, acquisition, or sale of Stride.
- Category of personal information: Anonymized internet or other electronic network activity information including information regarding a consumer's interaction with an Internet Web site, application, or advertisement such as cookies and marketing pixels.
 - Business or commercial purpose for which collected: To market products and services that may be of interest to you.
 - Categories of sources from which this personal information was collected: From your direct use of our website.

• Categories of third parties with whom we share this personal information: Third party marketers and social networks.

<u>Personal Information Disclosed: Stride has disclosed the following categories of personal information in the preceding 12 months for our business purposes:</u>

- Identifiers such as a real name; alias; postal address; unique personal identifiers such as application and loan numbers; email address; telephone number; social security number; driver's license number or passport number; or other similar identifiers, and Professional or employment-related information in order to provide you with financial products and services to service financial products and services obtained from us.
- Internet or other electronic network activity information including information regarding a consumer's interaction with an Internet Web site, application, or advertisement such as cookies and marketing pixels for marketing to third-party marketers to market our products and services that may be of interest to you.

Stride has not sold consumers' personal information for a commercial purpose in the preceding 12 months, and Stride will not sell consumers' personal information to third parties for a commercial purpose. Stride does not sell the personal information of minors under 16 years of age without affirmative authorization.

III. Your Right to Know and Right to Delete under the CCPA

Right to Know: You have the right to request that Stride disclose certain items about your personal information subject to the CCPA that we: (i) collect; (ii) sell; or (iii) disclose for a business purpose, as applicable to Stride's business practices ("Request to Know").

Personal Information that we Collect: You have the right to request that Stride disclose to you the following regarding your personal information subject to the CCPA that we collect (as applicable to Stride's business practices): (i) the specific pieces of personal information; (ii) the categories of such personal information; (iii) the categories of sources from which such personal information is collected; (iv) the business or commercial purpose for collecting or selling such personal information; and (v) the categories of third parties with whom we share personal information.

Personal Information that we Sell and/or Disclose for a Business Purpose: You have the right to request that Stride disclose to you the following regarding your personal information subject to the CCPA that we sell and/or disclose for a business purpose (as applicable to Stride's business practices): (i) the categories of personal information that we collected about you; (ii) the categories of personal information about you that we sold; (iii) the categories of third parties to whom the personal information was sold; and (iv) the categories of personal information that we disclosed about you for a business purpose.

Right to Delete: You have the right to request that Stride delete any personal information subject to the CCPA about you that we have collected or maintained (as applicable to Stride's business practices) ("Request to Delete").

How to submit a Request to Know and/or a Request to Delete: You can submit a Request to Know and/or a Request to Delete by contacting us at <u>support@stridefunding.com</u> with the subject line "Request under CCPA," toll-free 800-975-7812, or the chat function at the bottom of the screen. We will verify your request by using information we already have on file that we believe will sufficiently confirm your identity. We may require to ask for additional information to verify your request.

This request may be denied if you provided your personal information in order to obtain financial products and services from us or if such personal information is required to provide you with products and services you have requested, as regulated by the federal Gramm-Leach-Bliley Act or the California Financial Information Privacy Act. Please allow 45 days for a response.

IV. Right to Non-Discrimination for the Exercise of Your Privacy Rights under the CCPA

Stride is prohibited from discriminating against you because you have exercised any of your rights under the CCPA. Specifically, Stride cannot do any of the following: (i) deny good or services to you; (ii) charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (iii) provide a different level or quality of goods or services to you; or (iv) suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services or a different level or quality of goods or services or a different level or quality of goods or services or a different level or quality of goods or services or a different level or quality of goods or services or a different level or quality of goods or services.