

Privacy Notice

Last Updated: March 2024

WHO WE ARE

Country Financial, LLC d/b/a "Pledge Financial" (referred to as "us", "we", "our", or "the Company") operates the www.PledgeFin.com website (hereinafter referred to as "Site"). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you visit the Site, how we may provide you with products or services that you may be interested in ("the Services") and the choices you have associated with that data. For any questions or concerns regarding this policy, please contact us at Privacy@PledgeFin.com.

OUR COMMITMENT TO YOUR PRIVACY

Your privacy is critically important to us. We are dedicated to protecting the personal information you provide and ensuring that your rights to privacy are upheld within our Service.

INFORMATION WE MAY COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a specific consumer or device ("personal information"). The following chart outlines the categories of personal information concerning consumers collected within the last twelve (12) months:

Category	Examples	Collected
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<p>A. Identifiers</p>	<p>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, or other similar identifiers.</p>	<p>YES</p>
<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p>A name, signature, Social Security number, physical characteristics or description, 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. Some personal information included in this category may overlap with other categories.</p>	<p>YES</p>
<p>C. Protected classification characteristics under applicable or federal law</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>YES</p>
<p>D. Commercial information</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>YES</p>
<p>E. Internet or other similar network activity</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>NO</p>

F. Geolocation data	Physical location or movements.	YES
G. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
H. Professional or employment-related information	Current or past job history or performance evaluations.	NO
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
J. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Sensitive Information

We may also collect and process information that may be considered categories of “Sensitive Information” to fulfill your requests or market our Services. However, this data is collected and processed **without** the purpose of inferring characteristics about a you, and as such is not considered “Sensitive Information” under the applicable laws or regulations.

Categories of this type of information include:

- government identifiers (social security, driver's license, state identification card, or passport number);

- complete account access credentials (usernames, account numbers, or card numbers combined with required access/security code or password);
- precise geolocation;
- racial or ethnic origin, religious or philosophical beliefs, or union membership;
- mail, email, or text messages contents;
- unique identifying biometric information; and
- health information.

Business Information

We also collect information about businesses and their representatives that engage with us such as EIN, TIN, address, phone number, email address, bank account information (collectively, “Business Information”). This information is generally not considered Personal Information because it relates to a business. If such Business Information relates to a business contact person, we will treat it as Personal Information.

SOURCES OF INFORMATION

We acquire the aforementioned categories of personal information from various sources including:

- Directly from you when you provide it to us.
- Third party data sources
- Automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and/or other tracking technologies.
- From third-party business partners such as social media sites, ad networks, lead generators and analytics providers and
- Information that is publicly available online or elsewhere

Information You Provide To Us

The information we collect may include:

- Information that you provide by filling in forms on our Site. This includes information provided at the time of registering to use our Site, making a purchase on our Site, subscribing to our emails or text messages, or requesting further services. We may also ask you for information when you report a problem with our Site.
- Records and copies of your correspondence (including e-mail addresses, phone numbers, physical address, and other forms of identifiable information) if you contact us.
- Details of transactions you carry out through our Site and of the fulfillment of your requests. You may be required to provide financial information before engaging in services.
- Your search queries on the Site.
- Information provided to us through social networks or third-party platforms when you, for example, engage with our social media content, or communicate with us via social media (such as your name, e-mail, profile picture, likes, location, friend list, photos or other information described by the applicable social network or platform).

We receive and store any personally identifiable information that you choose to enter through the Site, including any submissions that you make or content you provide on or through the Site.

HOW WE USE YOUR INFORMATION

We may use or disclose the personal information we collect for various business purposes, including:

- Fulfilling or meeting the reason for which the information is provided, such as enrollment and servicing of our Services.
- Providing information, products, or services requested by you.
- Marketing, sending you email alerts, newsletters, and other notices about our products or services.
- Enforcing our rights and obligations under contracts with you, including billing and collections.

- Assisting you in identifying appropriate resources if we cannot serve you for reasons like the inability to operate in the requested state or ineligible claims.
- Improving our website and presenting its contents to you.
- Conducting testing, research, analysis, and product development.
- Performing audit, compliance, or other legal work associated with our business.
- Conducting financial reporting, accounting, and other general business administration.
- Assessing third-party vendors and service providers.
- Protecting the rights, property, or safety of us, our customers, or others.
- Responding to law enforcement requests and complying with applicable law, court orders, or governmental regulations.
- Evaluating or conducting a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceedings, in which personal information held by us is among the assets transferred.

WHAT PERSONAL INFORMATION DO WE SHARE WITH OTHERS?

We may disclose your personal information to a third party for business purposes. When we do so, Company enters into a contractual arrangement that describes the business purpose and requires the recipient to both: (A) keep that personal information confidential; and (B) not use it for any purpose except performing the obligations under the contract.

A. With Service Providers

We may share information about you with companies that work for or provide services to us such as our:

- Billing processors;
- Subcontractors;
- Software providers;
- Marketing companies;
- Outside auditors and professional advisors;
- Potential business merger, acquisition, or sale partners; and
- Regulators, government agencies.

B. With Mailing List Partners

We may share your name and address with others, such as marketing organizations, corporate affiliates, or other businesses for “mailing list” purposes.

C. With Corporate Entities for Business Transfers

We may transfer your personal information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal information provided through the Services in a manner that is consistent with this Notice.

D. With Law Enforcement or Other Third Parties for Legal, Compliance, and Safety Purposes

We may be required by law to comply with a valid legal process, such as a subpoena, court order, or search warrant, or where there is a lawful request, to disclose information about you. We may also share information about you to protect our customers, employees, or property; in emergency situations; and to enforce our rights under our terms of service and policies, in court or elsewhere.

CATEGORIES OF INFORMATION SHARED WITH THIRD PARTIES

In the preceding twelve (12) months, Company has disclosed the following categories of personal information to the third parties listed above for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories. (including name, email, phone, address, vehicle info, credit card/bank info, VSC purchases)
- Category F: Internet or other similar network activity.

- Category G: Geolocation data.
- Category K: Inferences drawn from other personal information

If we have collected or received your data in connection with a financial product or service, you may have additional rights regarding this sharing which are described below.

SALE OR SHARING, TARGETED ADVERTISING, AND PROFILING

The state data privacy laws require us to provide you with a statement on the sale of personal information. In the preceding twelve (12) months, Company has not sold personal information or engaged in any Targeted Advertising.

The Company does not process your personal information for the profiling activity that furthers a decision producing legal or similarly significant effects.

NOTICE REGARDING YOUR RIGHTS

Rights and Limitations on Use of Personal Information

With certain exceptions, you have the right to delete, know, correct, access, and request a copy of your personal information to move it elsewhere and opt-out of the processing of your personal information for certain purposes. In no event shall we discriminate based on such requests.

As an employer, we intend to retain each category of personal information for two years after you cease employment or from the time you submitted your information for employment, whichever is longer, or for such time as required by law (if such time frame is longer).

Access & Data Portability Rights

You have the right to request that Company disclose what personal information we collect, use, and disclose. If we receive and confirm your consumer request as verifiable *and no exception applies*, we will provide you with:

- 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 that personal information.

- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two lists disclosing:
 - Sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

Subject to certain exceptions, you have the right to request that we delete any of your personal information that we collected from you and retained. If we receive and confirm your consumer request as verifiable, unless an exception applies we will delete (and direct our service providers to delete) your personal information from our records.

State laws provide a number a reasons why a deletion request may be denied. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with state privacy acts.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Opt-Out Rights

Financial Information

If we have collected financial information from you, then you have the right to restrict the sharing of personal financial information with our affiliates (companies we own or control, or that own or control us) and outside companies that we do business with. Such rights do not prohibit the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending you information about some other products or services.

You can choose to:

- Restrict Information Sharing With Companies We Own or Control, or That Own or Control Us (Affiliates): Unless you direct us not to, we may share personal and financial information about you with our affiliates (and those affiliates may use the information to market to you).
- Restrict the Sale of Personal Information to Third Parties

Non-Financial Personal Information

If we collect information from you that is not related to a financial product or service, you have the right to request that Company does not sell or share that personal information as defined by the applicable laws.

EXERCISING YOUR DATA RIGHTS

To exercise any of your data rights, please submit a verifiable consumer request to Company by:

- Visiting and submitting a request at our [Data Requests Page](#)
- Calling us at 619-350-1571
- Via email at Privacy@PledgeFin.com (please include “Data Privacy Request” in the subject line).

Only you or someone legally authorized to act on your behalf may make a verifiable consumer request related to your personal information.

Response Timing and Format

Company endeavors to respond to a verifiable consumer request as soon as possible but within forty-five (45) days of receiving it. If Company requires additional time to process your request, up to a maximum total of ninety (90) days from the date the request is received, we will notify you of this and inform you of the reason for requiring the additional time. For do not sell or share requests, we endeavor to respond to the verifiable request within fifteen (15) days.

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 or have denied a request, if applicable.

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.

Non-Discrimination

Company will not discriminate against you for exercising any of your data privacy rights as described above. Unless permitted by the applicable laws, Company will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

CHILDREN'S PRIVACY

Our Service does not specifically target children under the age of 13. However, if it comes to our attention that a child's information has been collected without parental consent, we will remove such data from our records.

SECURITY MEASURES

We employ robust security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal data.

TESTIMONIALS

We may display personal testimonials on our website in addition to other endorsements. With your consent, we may post your testimonial along with your name and city/state of residence. If you wish to update or delete your testimonial, you can contact us at Privacy@PledgeFin.com.

DO NOT TRACK DISCLOSURES

How do we respond to Web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites or online services?

We currently do not respond to DNT signals in browsers.

May other parties collect personally identifiable information about an individual consumer’s online activities over time and across different websites when they visit the Site?

No.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to update our Privacy Policy periodically. Changes will be notified to you by posting the new Privacy Policy on this page and updating the “effective date” at the bottom.

CONTACT US

For any questions or requests regarding your data, please contact us at Privacy@PledgeFin.com or write to us at:

Pledge Financial
Attn: Data Privacy Department
14350 N 87th St.
Suite 305
Scottsdale, AZ 85260

Phone (619) 350-1571