

Privacy policy

Effective date: 12/22/2021

Last updated date: 12/12/2021

Thank you for your interest in CURO Credit, LLC dba First Phase (“CURO Credit,” “First Phase,” “we,” or “us”). First Phase is a brand associated group of companies which provides, or arranges, for consumers to obtain various financial products and services such as credit cards. We welcome you to our website at <https://www.FirstPhaseCard.com>, as well as all related websites (the “Site”), and products and services provided by us and certain third parties (collectively, together with the Site, our “Service”). By accessing or using the Service or the Site, you acknowledge that you have read, understood, and agree to the terms of this privacy policy (“Privacy Policy”). If you cannot agree to the Privacy Policy, then please do not use the Service or the Site. As you use our Service, you may provide us with information about you, including information that can be used to identify you. This Privacy Policy explains (1) your responsibilities when using the Site and the Service, and (2) how First Phase may collect, use, and disclose information you provide us and other information we receive related to your use of the Service.

If you have questions about this Privacy Policy, please contact us.

1-855-435-7303 PrivacyPolicy@FirstPhaseCard.com

What does First Phase do with your personal information?

We collect information from a variety of sources, including information provided by you, information we collect when you visit our Site, transaction information, and information we collect about you from third party sources. This information may include:

- Social Security Number
- Account Balances, Employment Information and Income
- Credit History and Scores
- Name
- Physical Mailing Address, including Zip Code
- Email Address
- Telephone Number(s)
- Mobile Number(s)
- Username

Why?

Financial companies choose how they share your personal information. Federal law, along with some state laws, give 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 Privacy Policy carefully to understand how we use your information. Please note: If you are using our Service you will also acknowledge our third party partner The Bank of Missouri’s privacy notice and that information will be shared with The Bank of Missouri to fulfill your

Service request. To view The Bank of Missouri's Privacy Policy please visit <https://www.firstphasecard.com/privacy-policy/the-bank-of-missouri/>.

If you are a new Customer, we can begin sharing your information with other third-party partners 30 days from the date you complete your first transaction with us. When you are no longer our Customer, we continue to share your information as described in this Privacy Policy; you can contact us at any time, however, to limit our sharing.

How can I review or update my personal information?

You may review and update the personal information we hold about you by contacting Customer Support at PrivacyPolicy@FirstPhaseCard.com.

How does First Phase collect my personal information?

We collect personal information from you as you use our Service but only as allowed by law. We limit the collection of personal information to what is relevant and necessary to accomplish a lawful purpose.

Automatically collected information

We do not collect home, business or email addresses, or account information from people who simply browse our Site. The information we do automatically collect includes the domain name or Internet Protocol address that relates to the machine or device used to access our Site, the type of browser and operating system used, the date and time when the Site is visited, device ID if you are on a mobile device, geolocation data and web pages displayed.

Like many websites, this Site uses "session cookies" and "persistent cookie" technology. Persistent cookies are small text files that our Site places within your browser so that it can remember you when you show up again later—like cookie crumbs. None of these cookies store any of your personal information. We use persistent cookies to enhance your experience on our Site while also protecting your privacy, as well as enhancing the functionality and performance of our Site, and for analytical purposes. On our Site, temporary cookies, also called session cookies, may be placed within your browser and expire as soon as you exit our site. Typically, session cookies are used to facilitate interactions between you and the fields in forms on our Site.

Managing cookie preferences differs from browser to browser, please refer to your web browser for further information. If you would like to disable cookies from FirstPhaseCard.com, please use the help function in your web browser to restrict cookies from our Site.

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site, compile reports on the Site's activity, and provide other services related to Site activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to

Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

Third Party Collection

Although we do not collect personally identifiable information on consumers that only visit our Site, there exists the possibility that other third parties conduct online tracking on our Site over which we do not control. Such third parties may collect Personal Information about your online activities over time and across different websites when you use our Site. We do not control these third parties, who may engage in practices that differ from those described in this Privacy Policy.

We use data collected by mobile carriers for the purpose of verifying identity and preventing fraud. We may continue to access and use this data throughout the duration of the business relationship.

When logging into a third party service (such as a social network) or a website different from our Service, please be aware that the privacy practices of those services may differ. Use of the information will be governed by their privacy policies, and you may be able to modify your privacy settings on their websites. We encourage you to read the privacy policy for each website you visit. We are not responsible for the privacy policies or practices of linked third party sites or services.

Online Tracking

We partner with companies that deliver ads for our Services on sites that you visit on the web. In order to provide you with a more appropriate online experience, some of our ads that you may see are based on your previous online activity on our Site and other websites. Information about your online activities, combined with other information, may be used to select an ad for a product or service that better matches your interests - which is called online behavioral advertising (OBA) or interest-based advertising.

You can opt out from receiving ads based on your online behavior either by visiting the Digital Advertising Alliance (DAA) opt out page at <http://www.aboutads.info/choices/>. If you elect to opt out of OBA, you will still see ads, but they may not be as pertinent to you. Please keep in mind that opting out is cookie-based and will only affect the specific computer and browser on which the opt-out cookie is applied. If you delete your browser cookies or if you use a different computer or a different browser and want to continue to be opted out of OBA, you will need to opt out again.

How We Respond to Do Not Track Signals

Our Site does not currently have the capability to recognize the various Do Not Track signals or mechanisms from different web browsers. For more information on Do Not Track please visit <https://allaboutdnt.com>.

How does First Phase use my personal information?

First Phase uses your personal information for the following reasons:

- Provide you with our Service;

- Facilitate the processing of your transactions;
- Facilitate the maintenance of your accounts;
- Facilitate the application for credit card products;
- Communicate with you if there is a problem completing a transaction you requested or to discuss a problem with your account;
- Maintain regular communications with you concerning transactions you initiate, such as requesting information or assistance, submitting an application, making payments, or transferring funds;
- Maintain general communications with you about the Site and Service;
- For marketing purposes;
- Respond to court orders and legal investigations;
- Provide you with Customer Service and support;
- Safeguard against potential fraud;
- Protect data from unauthorized parties and comply with legal requirements;
- Enforce this Privacy Policy, Terms of Use, and any other agreements you have entered into with us;
- For any other purpose for which you provide consent; and
- For any other legitimate business purpose.

We may deidentify and aggregate data collected through the Service and use it for any purpose.

How does First Phase share my personal information?

All financial companies need to share Customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their Customer's personal information; the reasons First Phase chooses to share; and whether you can limit this sharing.

How and Why First Phase Shares Information

Reasons we can share your personal information	Does First Phase Share?	Can you limit this sharing?
For our everyday business purposes , we share your personal information with service providers to perform our Service, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No

Reasons we can share your personal information	Does First Phase Share?	Can you limit this sharing?
For our marketing purposes we share your personal information in order to offer our products and services to you	Yes	No
For joint marketing , we share your personal information with other financial companies	Yes	No
For our affiliates' everyday business purposes we share your personal information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes we share your personal information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For our non-affiliates to market to you	Yes	Yes
To detect, investigate, prevent, or take action against illegal activities or fraud	Yes	No
If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider	Yes	No
For any other legitimate business purposes allowed by law	Yes	No

Affiliate Marketing: We will not share phone numbers or text message opt in consents with any of our affiliates for joint marketing purposes. In order to receive text messages from our affiliates, you will have to explicitly opt in and consent to their privacy policy directly with them.

To limit our sharing

[Click here to access our opt-out mail form.](#)

How does First Phase protect my personal information?

We take reasonable administrative, technical, and physical security precautions to protect the personal information collected or maintained by us against loss, unauthorized access, and illegal use or disclosure. As examples, these measures include computer safeguards and secured files and buildings, among other things. We use encryption software to protect the security of individuals' personal information during transmission of such information through our Site (for example, the information provided by consumers when submitting an application to us for a loan product). Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure of your personal information.

Children's Privacy

The Services are not intended for use by children. We do not knowingly collect personal information from children under the age of 16 years. Please contact us if you believe we may have unknowingly collected information about a child under 16 years of age, and we will take immediate steps to delete any such personal information.

California Privacy Rights

If you are a California Consumer, you have certain rights with respect to the collection, use, transfer, and processing of your "Personal Information", as defined by the California Consumer Privacy Act (CCPA). We reserve the right to limit these rights where permitted under applicable law, including where the Personal Information collected about you is subject to the Gramm Leach Bliley Act (GLBA) or the California Financial Information Privacy Act (CalFIPA), where your identity cannot be reasonably verified, or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

In the preceding 12 months, we have not sold Personal Information about consumers.

In the preceding 12 months, we have not sold Personal Information about children under the age of 16.

Individual Rights

Right to Know About Personal Information Collected, Disclosed, or Sold

California Consumers have the right to request that First Phase disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Right to Know requests you can make:

1. Right to Know (Abbreviated Request): If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
 - a. Categories of Personal Information collected in the past 12 months;
 - b. Categories of sources from which Personal Information is collected;
 - c. Business or commercial purpose for collecting or disclosing Personal Information; and
 - d. Categories of third parties with whom Personal Information has been shared.
2. Right to Know (Specific Pieces of Information Request): If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:

- a. Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless First Phase determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

Right of Deletion

You have the right to request that First Phase and our service providers delete any Personal Information about yourself that First Phase has collected from you upon receipt of a verifiable request. This right is subject to exceptions.

Right to Opt Out of the Sale of Information

California Consumers have the right to opt-out of the sale of Personal Information by a business that sells Personal Information. **First Phase does not sell any Personal Information of California Consumers.**

Submitting Requests

- You can submit your request by visiting our request website at <https://secure.firstphasecard.com/consumer-privacy/>.
- or by calling us at 855-435-7301

You may also submit a request via email at privacy@FirstPhaseCard.com.

Personal Information Collected Pursuant to GLBA and/or CalFIPA

Much of the Personal Information collected about you by First Phase is in connection with the furnishing of credit or in response to a request for credit. Such Personal Information is collected and handled pursuant to the GLBA and/or CalFIPA and is therefore exempt from the requirements of the CCPA, including the consumer request requirements described in this section.

Verifying Requests

First Phase provides California Consumers with the ability to submit requests through our request website, our telephone number, and our email address. First Phase must verify that the person requesting information or deletion is the California Consumer about whom the request relates in order to process the request. To verify a California Consumer's identity, we may request five (5) pieces of Personal Information about you when you make a request to compare against our records. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in your request to verify your identity. First Phase reserves the right to take additional steps as necessary to verify the identity of California Consumers where we have reason to believe a request is fraudulent.

Authorized Agent

Consumers may use an authorized agent to submit their request. The authorized agent must be registered with the California Secretary of State and be authorized to submit requests on behalf of a consumer. If the consumer chooses to use an authorized agent and provides the authorized

agent with written permission to allow them to submit the consumer's request, the authorized agent should send a copy of the signed permission by the consumer to First Phase. Failure to submit proof of signed permission may result in First Phase denying the consumer's request. First Phase will require the consumer to verify his or her identity and directly confirm with First Phase that the consumer has provided the authorized agent with permission to submit the request.

Right to Equal Service

First Phase will not discriminate against you because you exercised any of your rights, including, but not limited to, by:

- Denying goods or services to you.
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

North Dakota Residents

We will not disclose information about you with non-affiliated, third party companies or financial institutions, other than as required or permitted by law, without your express permission.

Data Retention

The data collected will be retained as necessary to perform our Services and for a reasonable period of time afterward. Please be aware that some or all of the data retained by us may be necessary for the Site to function properly.

Changes

Our Privacy Policy reflects our current business practices and is subject to change without notice.

We reserve the right, in our sole discretion, to modify, add, revise or delete provisions of our Privacy Policy at any time. If our practices change regarding your Personal Information, we will make reasonable efforts to provide notice to you of these changes. Your use of the Service after an update to the Privacy Policy means that you accept the new Privacy Policy. We will post the effective date of any change at the beginning of our Privacy Policy. We encourage you to visit our Site regularly so that you remain aware of how our Privacy Policy may affect you.

Contact Us

1-855-435-7303 PrivacyPolicy@FirstPhaseCard.com

Attn: Privacy
3615 N Ridge Rd
Wichita, KS 67205

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include companies with a common ownership as CURO Credit, LLC.

Non-affiliates

Companies not related by common ownership or control. They may be financial and nonfinancial companies. Non-affiliates include marketing companies which sell information for marketing purposes.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Joint marketing partners include pre-paid card companies, partners that promote our products, and other lending companies.

NOTE: First Phase is not the issuer of First Phase Visa credit cards. The actual lender is an unaffiliated third-party, The Bank of Missouri. To view the Privacy Policy of the lender, please visit <https://www.firstphasecard.com/privacy-policy/the-bank-of-missouri/>.