

# Global Primex LLC Online Privacy Policy

Effective Date: February 3, 2021

When visiting or using our websites, communicating with us electronically, interacting with us on social media or through ad content, or using a mobile application of Global Primex LLC (each a "Site"), this U.S. Online Privacy Notice ("Online Privacy Notice") applies to you and governs our collection, storage, sharing, and use of your information.

Please note, if you apply for or use a product or service ("Financial Product") of Global Primex LLC or its issuing banks (each a "Bank"), the Gramm-Leach-Bliley Act and similar state financial privacy laws govern your financial privacy rights. Therefore, if you are a customer or consumer of one of our Financial Products, you should consult the Privacy Notice associated with that Financial Product (click here for [Settle®](#) and here for [VLoad®](#)) for information on collection, storage, sharing, and use of your information. These are distributed annually to each customer, as required by applicable law, and available online as well.

Please note, if you are a California resident, you may have additional privacy rights in addition to the generally applicable privacy rights described in this privacy policy. Please scroll to the bottom of the page for more information on your California-specific rights.

## Information We Collect

When you visit a Site, we may collect both personally identifiable information and anonymous information. Personally identifiable information ("Personal Information") means information (such as name, demographic, or contact information that identifies you personally). Anonymous information includes information that does not identify you personally or contain personal identifiers ("Anonymous Information"), including internet or other electronic network activity information such as browsing history, cookies, and interactions with our Sites.

Information collected in connection with your application or use of a Financial Product is described in the applicable Privacy Notice.

## How We Collect Information

We may collect Personal Information from you directly:

- in connection with a potential application for a Financial Product submitted through a Site.
- when you complete and submit online forms or fields available at a Site.

We may append and enrich the information we have about you with information purchased from third party data suppliers.

We may collect Anonymous Information such as connection, activity, and usage data, when visitors and users navigate to and around the Sites:

- Through your browser when you visit the Site, which includes information such as your Media Access Control (MAC) address, browser type, device type, and operating system.
- From your IP address, which is automatically logged in our server when you visit a Site.
- Using cookies or other digital tracking tools such as web beacons (also known as pixel tags or clear GIFs). See the Use of Cookies and Web Beacons section below for more information.
- From feedback that does not personally identify you voluntarily provided to us on a Site.
- Using a website recording service, which may record mouse clicks, mouse movements or page scrolling but does not record any Personal Information.
- From de-identified or aggregated Personal Information, including payment data associated with a Financial Product.

## How We Use Your Information

As noted above, Personal Information provided through an application for or use of or interaction with a Financial Product is used solely to establish your customer relationship and is subject to the Privacy Notice governing the Financial Product you selected.

Personal Information provided or collected through other venues on the Site may be used in the following ways:

- To respond to your inquiries or requests; and
- To send you Global Primex LLC marketing communications that we believe may interest you.

We may use Anonymous Information in the following ways:

- To evaluate the Site's effectiveness and usability

- To improve our products or services
- To ensure the Site displays properly and diagnose problems
- To measure the number of visitors to the Site
- For other activities to the extent permitted by law.

We may aggregate or de-identify your Personal Information for these same purposes.

## Security

We maintain administrative, technical, and physical safeguards designed to protect the Personal Information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. SSL encryption also is used on our Sites when you are asked to enter confidential information as part of your application. You can tell you have entered an encrypted session in several ways. Whenever you see an unbroken key, a locked padlock, or similar icon on your browser screen, you have entered an encrypted session. In addition, when your session changes from "http" to "https," you are in an encrypted session.

## Children

We do not knowingly collect or use Personal Information from children under 13 years of age without obtaining verifiable consent from their parents. We are not responsible for the data collection and use practices of non-affiliated third parties to which our Site may link.

## Links to Other Websites

We are not responsible for the information collection practices of third-party links you click to from our Site. We cannot guarantee how these third parties use cookies or whether they place cookies on your computer that may identify you personally. We urge you to review the privacy policies of each of the linked websites you visit before you provide them with any personal information.

## Use of Cookies, Web Beacons, and Tracking Technologies

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit a Site. When you return to Sites – or visit websites that use the same cookies – they recognize these cookies and therefore your browsing device.

We use cookies to do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience. They can also help ensure that ads you see online are more relevant to you

and your interests. We also use similar technologies such as pixel tags and JavaScript to undertake these tasks.

We use cookies to:

- Ensure your security and privacy when in our secure Sites
- Store login details for our secure sites
- Temporarily store input information in our calculators, tools, illustrations and demonstrations
- Provide you with ads that are more relevant to you and your interests, and improve our targeting and enhance your journey through our sites and partner sites
- Improve our understanding of how you navigate through our sites so we can identify improvements
- Evaluate our sites' advertising and promotional effectiveness; and
- We use both our own (first-party) and partner companies' (third-party) cookies to support these activities

We may also allow our business partners to place web beacons on our site or to place cookies on your device for advertising or other purposes.

## Disabling Cookies and Do-Not-Track

While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a "Do Not Track" signal in the HTTP header from your browser or mobile application. We track your activities if you click on advertisements for Global Primex LLC services on third-party platforms such as search engines and social networks and may use analytics to track what you do in response to those advertisements. We may also use web beacons and tracking URLs in our messages to you to determine whether you have opened a certain message or accessed a certain link.

### **NOTICE TO CALIFORNIA RESIDENTS**

The California Consumer Protection Act (CCPA) gives California residents rights to receive certain disclosures regarding the collection, use, and sharing of Personal Information, as well as rights to control this information.

It is important to note that the CCPA excludes Personal Information already covered by financial services privacy laws such as the Gramm-Leach-Bliley Act (GLBA) or California

Financial Information Privacy Act (CFIPA). As a result, the disclosures and rights granted by the CCPA do not apply to Personal Information related to a financial account. If you are a customer or consumer of our Financial Products, please consult the Privacy Notice associated with those product(s) to learn about our information practices and your privacy rights.

In this section, the capitalized words have the meaning as stated in the CCPA (and any final regulations, when available).

### **Collection and Disclosure of Personal Information.**

Global Primex LLC may collect Identifiers from or about California residents for direct marketing purposes (i.e., in order to promote our Financial Products). We may obtain this information from our lead generation partners. In order for Global Primex LLC to receive your information from one of our partners, you must opt-in to the partner sharing your information for direct marketing purposes or the partner may collect your information from publicly available sources. Global Primex LLC keeps a record of your opt-in to ensure that we are not marketing to prospects without consent.

If you have received direct marketing from Global Primex LLC, there are cases where Global Primex LLC is not able to determine a prospect's current contact information with the information provided by our lead generation partners. In those cases, Global Primex LLC uses third-party identity resolution service providers in order to verify the address and aid us in determining whether to use the lead, in which case we will share contact information with these third-party service providers; however, our identity resolution service providers are contractually not permitted to use your information for any other purpose.

Global Primex LLC does not Sell Personal Information as that term is defined in the CCPA.

### **Use of Personal Information**

Global Primex LLC uses this Personal Information:

- to market Financial Products
- to measure ad impressions to unique visitors, verify positioning and quality of ad impressions
- to audit compliance with web standards
- to improve our products and services
- for debugging, user enhancement, and other analytical purposes.

## **Right of Access and Deletion under CCPA**

California residents have the right to request a copy of (i) the Categories of Personal Information that about you, (ii) the Specific Pieces of Personal Information we've collected about you, (iii) the Categories of Sources from which we collect your Personal Information, (iv) the purpose for collecting your Personal Information, and (v) the Categories of Third Parties to whom we Disclosed your Personal Information.

You also have the right to request deletion of Personal Information, subject to exceptions stated in the CCPA.

## **Making an Access or Deletion Request**

California residents may make an access or deletion request, you can call (305) 602-8344, write Global Primex LLC, Customer Service, 520 Brickell Key Dr., Suite O-305, Miami, FL 33131, or email [info@gp.com](mailto:info@gp.com). If you are not a resident of California, you may submit a request and we will process it even though the CCPA does not require us to do so. We reserve the right to change or stop the practice of accepting requests from individuals who are not California residents at any time and without prior notice.

For security purposes, the CCPA requires us to verify your identity before we are able to process an access or deletion request. As such, we may ask you to provide additional such as your first and last name, address, telephone number, email address, or other personal identifiers. This information will only be used for verification purposes.

Once we have verified your identity we will respond to your request as appropriate. For access requests, the requested information will be sent to you. For deletion requests, we may seek to confirm whether your request is for us to delete your Personal Information or opt you out of receiving marketing. Opting you out of receiving marketing allows us to maintain your Personal Information but flag it so that you do not receive further offers from Global Primex LLC. If we do not maintain this flag we will no longer have any record of you after fulfilling your deletion request, and it is possible that we again receive your information from one of our lead generation partners, in which case you may receive marketing from us again. We explain this in order to ensure we are meeting consumers' preferences. If we are unable to confirm your request, we will default to deleting your Personal Information.

Please allow up to 45 days for a response to access and deletion requests.

*Note to customers and consumers of Global Primex LLC:*

You have secure direct online access to your own Personal Information, including profile and commercial or transactional history, via account tools and settings associated with your account. For more information on your privacy rights related to your account information, please login into your online account center to see the privacy policy governing your account.

## Non-discrimination

We do not provide a different level or quality of experience or deny goods or services to you when you exercise your rights under the CCPA.

## Changes to this Notice

Global Primex LLC may change the Online Privacy Notice at any time by posting an updated version to this page and changing the "Effective Date" at the top of this notice. Any changes become effective when posted on the Site. You will be bound by changes if you use the Site after those changes have been posted.

## Questions?

If you have questions about this U.S. Online Privacy Notice, please contact us at:

Global Primex LLC  
Customer Service  
520 Brickell Key Dr., Suite O-305, Miami, FL 33131  
Email: [info@gp.com](mailto:info@gp.com)  
Tel: (305) 602-8344