

New Day Privacy Policy

Effective Date: May 9th, 2019

New Day Financial, LLC (“New Day” or “we” or “us”) is committed to privacy and will only use the personally identifiable information (“Personal Information”) that you provide in accordance with the terms outlined below.

This Privacy Policy covers any Personal Information we obtain when you visit us, use our services, or access the features on the websites that New Day owns or controls (today or in the future), including <https://www.newdayusa.com/> (collectively, the “Sites”). You can access the Sites in many ways, including from a computer or mobile phone, and this Privacy Policy will apply regardless of the means of access. This Privacy Policy also governs the use of Personal Information we obtain from you from any third party site or application where we post content or invite your feedback or participation. New Day cannot control the privacy policies or practices of sites or of companies that we do not own or control, and cannot control the actions of people we do not employ or manage.

1. Information We Collect

Personal Information

When you use our Sites, you may choose to provide certain information directly to us to request more information or services, including the following Personal Information:

- first name, last name;
- email address;
- username,
- phone number;
- billing address;
- mailing address;
- date of birth;
- social security or national identification number; and
- bank account information.

We may also collect the following from you directly and/or third party sources:

- Information about your loan transactions, such as your account balances with your creditors, payment histories, account activity, and all other information that may be contained in your credit card statements or other reports relating to your debt; and
- Information from consumer reporting agencies and other sources, such as your credit bureau reports, collection agency reports or other communications, and other information relating to your payment histories, creditworthiness, annual income, or ability to satisfy your obligations.

You may, however, visit our Sites anonymously, but will not be permitted to create an account or use certain features of our Sites. We will collect Personal Information from you only if you voluntarily submit such information to us. You can always refuse to supply Personal Information, except that it may prevent you from engaging in certain Site-related activities. We only use, share, and store Personal Information consistent with this Privacy Policy.

2. How We Collect Information

Site Usage

We collect Personal Information when you:

- visit our Sites;
- request information or support;
- upload any file, image, or document;
- request that we provide you with any services;
- take out a loan;
- fill out a form on the Sites; and
- otherwise interact with the Sites.

We also collect information in several ways by your use of the Sites. When you access the Sites, our servers log your IP address, the URL of your request and other information that is provided in the HTTP header. When you conduct searches on the Sites, we may log the search terms that you use. Also, our third-party service providers and clients may ask you voluntarily to provide Personal Information on their websites and may share such Personal Information with us, as governed by their respective privacy policies. Our use of information received from a service provider will be dictated by the service provider's or client's privacy policies and not this Privacy Policy. New Day collects this information in order to provide information about our services that will meet the expectations of our clients.

Cookies

We also use cookies to collect information about you. A "cookie" is a small data file stored on your web browser or on your mobile device that allows us to recognize your computer or mobile device when you visit the Sites by associating identification numbers with other user information you have provided us. Some cookies will remain on the hard drive of your computer or mobile device for the duration of your browser or user session, while others will remain until deleted by you. You may also be able to configure your computer or mobile device to limit the collection of these "cookies," but that limitation may also limit our ability to provide all the services or functionality of the Sites. For more information about cookies including how to set your internet browser to reject cookies please go to www.allaboutcookies.org.

Pixel Tags

We may use pixel tags (also called web beacons or clear gifs) on our Sites. They can help us analyze what our customers like to do on our Sites and the effectiveness of our features and

advertising. They can also help us customize your browsing experience. We may use information collected through pixel tags or tracked links in combination with your personal information. We may also combine personal information you provide to us with other personal information (such as purchase history and demographic information). If we work with other companies to help us track, collect and analyze this information, they will be prohibited from using this information for any other purpose.

Google Analytics

The Sites use Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist us in understanding how the Sites are used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Sites, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Sites, compiling reports on Sites’ activity for our use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that by doing so, you may not be able to use the full functionality of the Sites. The use of cookies by Google Analytics is covered by Google’s privacy policy.

You can learn more about Google’s practices at <http://www.google.com/policies/privacy/partners> and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

3. How We Use Information

We collect and use your Personal Information for the following purposes:

- to provide you with the products and services that you request;
- to verify your identity or affiliation;
- to make your customer account available to you;
- we may use information in the aggregate to understand how users as a group use the services and resources provided on our Sites;
- to improve our Sites;
- to improve customer service;
- to more effectively respond to your customer service requests and support needs;
- to share your information with third parties as described in this Privacy Policy;
- to correspond with you about your orders and provide other information we believe is relevant to you; and
- to administer a Site feature.

4. Information Security

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your Personal Information and data stored on our Sites. These safeguards vary based on the sensitivity of the information that we collect and store. For example, we store usernames, passwords, PINs, and other log-in information in encrypted form. However, we cannot and do not guarantee that these measures will prevent every unauthorized attempt to access, use, or disclose your information because despite our efforts, no internet and/or other electronic transmissions can be completely secure.

We recommend that you change your password periodically. You are responsible for maintaining the security of your account username and password. If you believe that your account username and/or password have been stolen or been made known to others, it is your responsibility to immediately contact us at Privacy@Newdayusa.com and change your password. We are not responsible if someone else accesses your account through information they have obtained from you.

5. Sharing and Disclosure of Personal Information

Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Sites.

We also may disclose your Personal Information:

- in situations where sharing or disclosing your information is required in order to offer you the products services you request;
- to our subsidiaries and affiliates, including Chrysalis Analytics, LLC, with assurances they will treat your Personal Information consistent with this Privacy Policy;
- to a third party or parties, with your consent and where disclosure is required by law;
- if, in our reasonable judgment, it is necessary enforce compliance with our internal policies or to protect our Sites, customers, or others; and
- to any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of our assets.

We may also be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request.

Potential Borrowers

If you submit a loan application or request that we provide you with any services, you authorize us to share your credit report with our affiliates only to process your loan application. Additionally, we may be required by law to provide you with additional privacy notices or disclosures when you request that we provide you with certain services. These disclosures will relate to how we use and share the Personal Information collected to provide you with the specific services you request.

6. Limiting the Sharing of Credit Information

Credit reporting agencies may share your Personal Information with other companies when you apply for a loan. This may cause you to receive email or phone calls that you didn't ask for, offering credit cards, refinancing or other loan products.

You can stop these calls and Emails by opting out of these prescreened credit offers. Simply call (888) 567-8688 or visit www.optoutprescreen.com.

7. Correcting Your Information

We provide you the opportunity to update or correct the contact and loan application information that you have provided to us. You may review and update information stored in your application online until you submit your application. Once you have submitted your application, you may only change the information by directly contacting our mortgage hotline at (800) 995-0341 or emailing us at Privacy@newdayusa.com.

We recommend that you do not use email communications to send us sensitive personal information. If you need to change that personal information, we recommend that you call us directly.

8. Third Party and Social Media Sites

In general, the third-party providers that we use will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

Once you leave our Sites or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our Sites' terms.

Social Media Sites

We work with third parties, including social network sites like Facebook, and with application developers who specialize in social commerce so we can connect to your social networks. All of these companies operate Social Media Sites. We provide access to our Sites by third parties and business partners so we can generate interest in our products and services among members of your social networks and to allow you to share product and service interests with friends in your network.

The use of any features made available to you on our Sites by a third party may result in information being collected or shared about you by us or by the third party. Information collected or shared through any such third party features is considered public information by us because the Social Media Sites made it publicly available. If you do not want us to be able to access

information about you from Social Media Sites, you must instruct Social Media Sites not to share the information. We are not responsible for how these third parties may use information collected from or about you so be sure to review the privacy policies and privacy settings on your social networking sites to make sure you understand the information they are sharing. If you do not want a Social Media Site to share information about you, you must contact that site and determine whether it gives you the opportunity to opt out of sharing such information. However, we do identify any areas on our Sites where third parties share information about you.

We use features on Social Media Sites that allow you to express positive opinions about our services. Those Social Media Sites may collect or register your views about our services and make those views available to us and on public portions of the Social Media Sites. If you do not wish any of this to happen, you should not express your views about our services on Social Media Sites and you should review your privacy settings on such Social Media Sites. We are not obligated to display your name or other identifying information, account name, profile photo or other information or content on our Sites even if you express an opinion about our services or have consented to our use of such information or content. We reserve the right to remove the information of any person for any reason. We may also remove from our Sites, in our sole discretion, any product offering or any photo or product description relating thereto. If you would like us to delete the data we have collected about you that we have received through any social media provider or Social Media Site, please contact us. However, if your information is deleted you may not have access to certain promotions, services information or opportunities as a result.

Links

The Sites may list or link to third party products, services or websites. We do not have any control over the quality, safety or legality of the items advertised, the truth or accuracy of the listings, the ability of suppliers to sell items or the ability of buyers to buy items, or the truth or accuracy of any information on third party websites. For these reasons, New Day and its affiliates cannot ensure that a buyer or supplier will actually complete a transaction or that information on a third party's website is accurate or reliable. New Day will not be a party to any transactions between you and such third parties and any correspondence concerning such transactions should be conducted between you and the third party.

9. Children's Information

The Sites are only intended for individuals over the age of 18 who meet the criteria described in our Terms and Conditions. We do not under any circumstances knowingly collect information from children under the age of 13. Children under the age of 13 are prohibited from submitting any Personal Information to us through the Sites. If you believe a child has provided us with information, contact us at Privacy@newdayusa.com.

10. California Privacy Rights

If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of Personal Information with third parties for their

direct marketing purposes, in addition to the rights set forth above. Under California law, you have the right to send us a request at the designated address listed below to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
- the names and addresses of the third parties that received the information; and
- if the nature of the third party's business cannot be determined from their name, examples of the products or services marketed.

This information may be provided in a standardized format that is not specific to you. The designated email address for these requests is: Privacy@Newdayusa.com.

Also, please note that we have not yet developed a response to browser "Do Not Track" signals, and do not change any of our data collection practices when we receive such signals. We will continue to evaluate potential responses to "Do Not Track" signals in light of industry developments or legal changes.

11. Other Details

You acknowledge that this Privacy Policy is part of the Terms and Conditions for your use of the Sites, and you agree that using the Sites signifies your assent to our Privacy Policy. We reserve the right to change this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. As we may make changes from time to time without notifying you, we suggest that you periodically consult this Privacy Policy. Your continued use of the Sites after the effective date of any modification to this Privacy Policy will be deemed to be your agreement to the changed terms.

If you have any questions about your privacy or security on our Sites, please contact us using the following information:

<https://www.newdayusa.com/>

8160 Maple Lawn Blvd

Fulton, MD 20759

Privacy@Newdayusa.com

877-423-1400