

Privacy Policy

(Last Updated March 10, 2025)

PLEASE READ THIS PRIVACY POLICY (“POLICY”) CAREFULLY. This Policy describes the ways Flexible Finance, Inc., and its affiliates including Flexible Finance Servicing, Inc. and Flexible Finance Brokering, Inc. (collectively, “Flex”, “we”, “us”, “our”) or our vendors collect, protect, use, and disclose your personal information. Please note, our privacy practices are subject to the applicable laws of the places in which we operate. You will see additional region-specific terms that only apply to customers located in those geographic regions, or as required by applicable laws.

This Policy applies to all information we collect through our Services from current and former Flex users. “Services” means any products, services, content, features, technologies, functions, websites (the “Website”), mobile application (the “App”), and other services offered to you by Flex in connection with a Flex account. When you are no longer our customer, we continue to disclose your information as described in this Policy.

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1. Information We Collect.

The personal information we collect and obtain depends on how you interact with us, the Services you use, and the choices you make. When we use the term “personal information,” we are referring to information that identifies, relates to, describes, or can be associated with you. The following are the categories and specific types of personal information that we collect:

- **Identity and Profile Information.** This includes your phone number, email address, full name, address, and social security number.
- **Financial Information.** This includes your bank account numbers, debit, and/or credit card numbers that you link to your Flex account or give us when you use the Services.
- **Geolocation Information.** Including information that permits us to determine your location, such as if you manually provide location information or enable your mobile device to send us precise location information.
- **Device Information.** Including device identifiers, internet protocol (IP) addresses, cookies, beacons, pixel tags, mobile ad identifiers, or similar unique identifiers. Please see our [Cookie Policy](#) for more information.
- **Biometric Data.** We may collect information about your physical or biological characteristics such as photographs for verifying your identity or detecting fraud.
- **Customer Service Interaction Information.** We collect information you provide when you engage with Flex’s customer service personnel and mechanisms, including through recorded phone calls, chat conversations, surveys, and email correspondence.

- **Rental Information.** Account information (including property management company or landlord name), rent balance information (including current and historical balance), due dates, balances owed, and transaction history.
- **Inference Data.** Inferences drawn from or created based on any of the information identified above.
- **Professional or Employment Information.** Including business information, contact emails, phone numbers, and taxpayer ID numbers.

2. How We Collect Your Personal Information.

2.1. Directly from You.

We collect personal information you provide, such as when you register for an account or create a profile.

2.2. Communicating With You.

We use your personal information to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback, and to provide customer service.

2.3. Third Parties.

We may also collect personal information from other third parties, including service providers, internet service providers, rent payment portals, property management companies, rental management service providers, credit reporting agencies, government entities, data brokers, data analytics providers, advertising networks, card networks, and financial institutions.

3. How We Use Your Personal Information.

3.1. To Provide Our Services.

Flex uses your information to provide our products and Services. For example, we may use information to provide customer service and support, process transactions, resolve

disputes, collect payments, prevent fraud and illegal activities, customize the Services, authenticate and verify identities, and verify the accuracy of information.

3.2. To Improve Our Services.

Flex uses information to improve our services, conduct research and analysis, develop new or improved products and Services, contact you, and provide anonymous reporting to others.

3.3. To Serve You and Better Protect Your Data.

We may use information to protect you, our partners, Flex, and others from fraud, malicious activity, and other privacy and security-related concerns and to provide customer support to you, including to help respond to your inquiries related to our service or developers' applications.

4. How We Protect Your Information.

4.1. Safety Policies.

Flex stores and processes your information while maintaining physical, electronic, and procedural safeguards. We maintain physical security measures to guard against unauthorized access to systems and use safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings, and we authorize access to personal information only for those employees or agents who require it to fulfill the responsibilities of their jobs.

5. How We Disclose Your Information.

5.1. For Our Business Purposes.

We disclose your information for a number of business purposes, including:

- To enforce any contract with you;
- To our data processors and other service providers, partners, or contractors in connection with the services they perform for us;

- If we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena);
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
- Between and among Flex and our current and future parents, affiliates, subsidiaries, and other companies under common control or ownership;
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of you, our partners, Flex, and others; or
- For any other notified purpose with your consent.

We may collect, use, and share information in an aggregated, de-identified, or anonymized manner (that does not identify you personally) for any purpose permitted under applicable law. This includes creating or using aggregated, de-identified, or anonymized data based on the collected information to develop new services and to facilitate research.

5.2. When Required by Law.

We will disclose your information with a third party when required to do so by law or by a government request or to combat fraud or criminal activity.

5.3. We Do Not Sell Information to Third Parties.

We do not sell your personal information to third parties.

6. Retention of Your Personal Information.

We retain personal information only for as long as necessary to fulfill the purpose(s) for which the information was collected, to provide our Services, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with all applicable laws.

7. What Are Your Options?

7.1. Update Notifications.

If you no longer wish to receive notifications about our Services, you may change your notification preferences by emailing help@getflex.com. Alternatively, you may be able to indicate your preference by logging into your account and adjusting your preferences or by following the directions provided with the communication. Flex reserves the right to close or limit access to your account should you opt out of the crucial notices that are required to perform the Services. You are still responsible for any amounts due to Flex even if we close or limit access to your account.

7.2. Update SMS Messaging.

You can opt out of receiving SMS messages by responding STOP to an individual message or by emailing help@getflex.com. Alternatively, you can update your communication preferences within the App. Again, Flex reserves the right to close or limit access to your account should you opt out of the crucial notices that are required to perform the Services. You are still responsible for any amounts due to Flex even if we close or limit access to your account.

7.3. Access Your Information.

You can review and edit your personal information at any time by logging in to your account on the App or by contacting us at help@getflex.com. You can also request to close your account by contacting us at help@getflex.com. If you close your Flex account, we will mark your account in our database as “Closed,” but will keep your account information in our database to comply with our legal obligations. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. If you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

7.4. Contact Flex.

If you have questions or concerns regarding this Policy, please contact us at help@getflex.com.

8. Children's Privacy.

In compliance with the Children's Online Privacy Protection Act, our Services are not designed for or available to persons under the age of 18. We do not knowingly collect personal information or data from persons under the age of 18. If you are under the age of 18, do not use Flex or provide any information or data to Flex. If we learn that we have collected or received personal information or data from a person under the age of 18 without verification of parental consent, we will delete that information. If you believe that we may have any information from or about a person under the age of 18, please contact us at help@getflex.com.

9. Changes to This Policy.

We may change this Policy from time to time by publishing a revised version on our Website or in the App. Your continued use of the Flex Website or the App after we make changes is deemed to be acceptance of those changes. Flex will notify you within thirty (30) days of any material change in Flex's information collection, use, or disclosure.

10. State Privacy Rights for California, Minnesota, and Oregon Residents.

This State Privacy Laws Notice is included in our Privacy Policy and applies to our processing of personal information as required by applicable state privacy laws, including (i) visitors to our Website or the App; (ii) users and potential users of the Services; and (iii) others who contact us or seek additional information about the Services.

10.1. Personal Information We May Collect.

The following chart shows the categories of personal information that we may have collected during the past twelve (12) months, the sources of such information, the

business purposes for which we may use such information, and the categories of third parties to whom we may disclose for such purposes.

For the table below, the list of examples for each category is intended to be illustrative and not exhaustive. We also may not collect or disclose every example listed (or use every example for each business purpose).

Categories of Personal Information	Types of Personal Information Collected	Sources of Personal Information	Business Purposes
Identifiers	<ul style="list-style-type: none"> ● Name (first, middle, last) ● Email address ● Phone number ● Postal address ● Unique personal identifier ● Online identifier ● IP address 	<ul style="list-style-type: none"> ● Directly from you or your communications with us (e.g., email, phone, letter) ● Cookies, online tracking technologies ● Your property management company or rental management service provider 	<ul style="list-style-type: none"> ● Providing our Services ● Identification and verification ● Communicating with you, including direct marketing about products or services that may be of interest to you
Sensitive Personal Information	<ul style="list-style-type: none"> ● Social security number 	<ul style="list-style-type: none"> ● Directly from you or your communications with us (e.g., email, phone, letter) 	<ul style="list-style-type: none"> ● Providing our Services ● Identification and verification
Commercial Information	<ul style="list-style-type: none"> ● Account information, including property management company or landlord name and account type ● Information about a rent balance, including current and historical balance ● Information about rent payment history, including 	<ul style="list-style-type: none"> ● Directly from you or your communications with us (e.g., email, phone, letter) 	<ul style="list-style-type: none"> ● Providing our Services ● Identification and verification

Categories of Personal Information	Types of Personal Information Collected	Sources of Personal Information	Business Purposes
	<p>due dates, balances owed, payment amounts and dates, and transaction history</p> <ul style="list-style-type: none"> • Information about account transactions, including amount, date, payee, type, quantity, price, location, involved securities, and a description of the transaction 		
Internet or Network Activity	<ul style="list-style-type: none"> • Internet browser • Operating system • Referral URL • Pages viewed • Date/time of visit 	<ul style="list-style-type: none"> • Cookies • Server logs • Cybersecurity vendors (e.g., endpoint security, anti-virus) 	<ul style="list-style-type: none"> • Providing access to our Website, the App, and our Services • Analytics regarding our Website and the App

10.2. Disclosures of Personal Information.

We do not sell your personal information. However, in order for us to provide the Services, we may share your personal information with certain third parties, including:

- Service providers, including those who work to enhance our Website, the App, and/or our Services, those who protect the security of our systems, and those who provide communications and marketing support to us.
- Business partners, including the property management companies with whom we partner.
- Legal and regulatory authorities (including to respond to a subpoena or court order, judicial process, or regulatory inquiry), to defend against fraud, lawsuits,

claims or other liabilities, and to prevent physical harm or financial loss in connection with any suspected or actual illegal activity.

10.3. Your Rights Under California Privacy Law.

Under California's Consumer Privacy Act (CCPA), certain rights with respect to your personal information may be available to you (subject to applicable limitations). These may include:

- **Right to Know:** The right to request that we disclose information about our collection and use of your personal information about you, including:
 - Categories of personal information we collect;
 - Categories of sources for the personal information we collect;
 - Our business or commercial purpose for collecting personal information;
 - The categories of third parties with whom we share that personal information; and
 - The specific personal information we have collected about you.
- **Right to Access and Portability:** The right to confirm whether we are processing personal information about you and to obtain a copy of such personal information we have collected about you, and, where required by law, obtain a copy of such personal information in a portable and, to the extent technically feasible, readily usable format.
- **Right to Delete:** The right to request we delete personal information provided to or obtained by us about you, subject to certain exceptions and to the extent required by law.
- **Right to Correct:** The right to request we correct inaccuracies in personal information, taking into account the nature and purposes of the processing of personal information.

- **Right to Limit Use and Disclosure of Sensitive Personal Information:** The right to request we limit our use and disclosure of sensitive personal information to certain purposes permitted by law and/or revoke consent to our processing of your sensitive personal information.

- **Right to Opt-Out:** The right to opt-out of certain types of processing of personal information, including:
 - To opt-out of the ‘sale’ of personal information or sharing or use of personal information for targeted advertising.

 - To opt-out of any processing of personal information for purposes of making decisions that produce legal or similarly significant effects.

Please note that not all rights above may be available to you.

10.4. Minnesota and Oregon Residents.

Under the Minnesota Consumer Data Privacy Act and the Oregon Consumer Privacy Act, Minnesota and Oregon residents have certain personal data rights, subject to various data exclusions and exceptions.

These rights include the right to:

- Know whether Flex is processing your personal information;

- Obtain a copy of your personal information;

- Correct inaccurate personal information;

- Delete your personal information;

- Transfer your personal information;

- Opt out of the sale of your personal information, or the processing of your personal information for targeted advertising purposes; and

- Opt in to the processing of your sensitive personal information for purposes not necessary for providing the Services or other purposes specifically permitted by law.

If you are an Oregon or Minnesota resident, and your data privacy request is denied, you have the right to appeal the denial by emailing help@getflex.com.

10.5. Exercising Your Rights.

If you are a resident of California, Minnesota, or Oregon and wish to exercise any of your rights described above, please submit a request to us by:

- Emailing us at help@getflex.com;
- Calling us at 888-205-9407; or
- Submitting a [data privacy request](#) on the Website.

Please note that you have a right not to receive discriminatory treatment for the exercise of your rights under applicable privacy laws.

Flex reserves the right to close or limit access to your account should you opt out of the processing of sensitive personal information such as financial information. Additionally, certain information we collect may be exempt from the state privacy laws because it is considered public information (e.g., it is made available by a government entity) or it is covered by a specific federal privacy law, such as the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act.

10.6. Verifying Your Request.

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. *Your request must be verifiable before we can fulfill such a request.*

Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf.

We will only use the personal information that you have provided in a verifiable request in order to verify your request. As stated above, we cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

10.7. Contacting Us.

If you have any questions regarding our privacy practices, please contact us via email at help@getflex.com.