

Privacy Policy

We believe trust, transparency and fairness are the most important values for finance. These are values guide all the decisions we make, including how and what information we gather. We've written our policy to be as clear and straightforward as possible to inform you about privacy policy while on Stilt's website.

Website Privacy Policy (LAST UPDATED: JANUARY 1, 2020)

This Privacy Policy explains how we collect and use information of any individual who visits our web site or opens an account on Stilt. If you have a loan with Stilt, please refer to the Customer Privacy Notice above for additional information applicable to you.

Best in Class SSL Protection

We work really hard to protect your information. It is really important to us. All data entered into the Stilt site is encrypted using industry-leading SHA-256 SSL technology before being sent to servers. The servers we use are highly secure and compliant with all Federal regulations.

No Account Information Shared

As a principle, no login details of your linked accounts, such as usernames and passwords, are accessible to anyone at Stilt. We do not store that information on our servers. The financial, social, and professional data we get from these sources is stored in a secure manner on off-site PCI compliant servers.

We Never Sell Your Information

We do not sell your information. To complete loan requests we may need to share or disclose information provided by you with our partners so that they can perform the requested services, but your information is not for sale.

Information you share

Your information is available to be reviewed and updated on your account profile page at any time. You can also send a request to team@stilt.com. Some information regarding your loan application cannot be changed due to laws or legal requirements, and in those cases we may not be able to accommodate your request. You can review and change your personal information by logging into the Stilt site and visiting your account profile page. You may also email us at team@stilt.com to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Information we share

Advertisers may use cookies on our site to collect information similar to the information we collect, and target ads to you based on information you included in your profile. We may also use remarketing to advertise to visitors who haven't completed a task, such as completing their loan application. Stilt may share information with third parties as described below:

Advertisers

Stilt may allow third-party advertisers to use cookies on the Stilt site to collect the same type of information for the same purposes as Stilt does for itself. They may be able to associate the information they collect with other information they have

about you from other sources. We do not necessarily have access to or control over the cookies they use, but you may be able to opt out of some of their

practices by visiting the following links: Network Advertising Initiative, Omniture, Aperture, Digital Advertising Alliance, and PrivacyChoice. Opting out does not prevent the display of advertisements to you. Stilt may also use certain remarketing services to advertise on third-party websites to previous visitors to our site. This means that we may advertise to previous visitors who haven't completed a task on our site (like completing a loan application). This could be in the form of an advertisement on a search results page, or a site in the network of our remarketing partners.

Partners and Service Providers

Some of the services that are offered through the Stilt site may be provided by third-party partners, like Experian. We may also outsource some of Stilt's functions to third-party providers, such as data storage providers, platform administrators, credit bureaus, collection agencies, loan servicers, payment processing functions, and/or other services. We may share information from or about you with these third-party providers so that they can perform the requested services or complete your requests.

Third-party accounts

You can connect your loan application to your accounts on third-party services, like LinkedIn, in which case we may collect and store information identifying your account with the third-party service. We may use the information to inform your application. When you connect an account with us, you are requesting our third-party financial aggregator, Intuit, to create a new 'token' for Stilt. That token gives access to view account information without giving permissions to perform any other action inside that account.

Aggregated Information

We may share aggregated, non-identifiable user information with third parties, such as advertisers and content distributors. For example, we may disclose the number of users that have been exposed to or clicked on advertisements.

Links

The Stilt site may contain links to unaffiliated third-party websites. Except as described in this policy, we do not share your personal information with them, and are not responsible for their privacy practices. We suggest you read the privacy policies on all such third-party websites.

Cookies

Cookies help us protect your account's security, and allow us to personalize your Stilt experience. We, and third parties with whom we partner, may use cookies, web beacons, local shared objects, and similar technology ("Cookies") to improve your user experience and the overall quality of our service. Cookies are small data files that may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the Stilt site, such as your browser type, preferences, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Most importantly, cookies help us protect your account's security. Cookies may be stored only during an individual session ("Session ID cookies") or have long-term expiration dates ("persistent cookies"). Session ID cookies follow your activities on our site so that we can ensure that no one is making changes to your profile or applying for loans, and expire when you close your browser. Persistent cookies that remain on your hard drive for an extended period of time so that we can recognize you when you return to our Site. The following is a list of the types of cookies that Stilt and its third-party partners use:

PROCESSES

These Cookies make the Stilt site work in the way you expect it to.

AUTHENTICATION, SECURITY, AND COMPLIANCE

We use these to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements.

PREFERENCES

These Cookies help the Stilt site remember information about how you prefer the site to behave and look.

ADVERTISING

These Cookies make advertising more relevant to you and more valuable to advertisers.

ANALYTICS

These Cookies help us understand how visitors use the Stilt site.

NOTIFICATIONS

We use these Cookies to give us notice of information or options that we think could improve your use of the Stilt site.

Cookie Management

It may be possible to disable some Cookies through your device or browser settings, but doing so may affect your ability to use the Site. The method for disabling cookies may vary by device and browser, but can usually be found in preferences or security settings.

Protecting your information

Stilt takes your privacy and security seriously. We have enabled HTTPS access to our site, in addition to SSL technology, and your login information of your financial accounts is not accessible to anyone at Stilt. This data is stored offsite. Additionally, there are a number of precautions you can take to protect the security of your computer, including selecting a strong Stilt password and not

sharing it with anyone. Stilt takes steps to safeguard your personal information through vigorous physical, electronic, and operational policies and practices:

Session Time-Outs: We employ session time-outs to protect your account. You will be logged out of the site after thirty minutes. This reduces the risk of others being able to access your account if you leave your computer unattended.

Protection of Account Numbers: After you have entered your account numbers, we will never display your account number.

Passwords: At a minimum, we require the use of both numbers and letters in your password. We have also instituted secure steps by which you can regain access to your account should you forget your password, including email reset. Your password is not known to any employee or third party with whom we may partner, and we will never ask you for your passwords as a means of identifying yourself. If you ever receive an email purporting to come from Stilt that asks for your password, you should immediately report this to team@stilt.com.

Secure, Off-Site Hosting: We store your personal and sensitive financial data such as Social Security numbers and bank accounts in a virtual private cloud hosted by Amazon Web Services.

Defined Service Access points: Data can only be read or written through defined service access points, the use of which is password-protected and limited to only those employees or third parties who have a need to know.

Secure Socket Layer certificate technology: We equip our servers with SSL certificate technology to provide a safe and secure channel to visit the Stilt site.

Data encryption: SSL also ensures that all data entered into the Stilt site is encrypted. For further encryption protection, we require a 128-bit secure browser for logins and transactions.

Network firewalls: There is no inbound communication allowed between data and application servers and the Internet.

Communications from Stilt

Stilt may send you notifications regarding your account. You cannot opt out of these notifications as they are in place to help protect your privacy and security, but you can opt out of any additional marketing communications. You can do this

by clicking the unsubscribe link at the bottom of any marketing communications you receive.

To protect your account, Stilt may send you notifications that confirm actions taken on your account. These notifications are typically sent to notify you of a change in status, or for legal or security purposes. For example, you may receive notifications confirming your registration and the successful submission of loan requests, as well as requests from us for additional information and reminders to sign your loan agreement.

You cannot opt out of these notifications as they are in place to protect the security of your account and personal information. We do this for your own protection so that you can be sure no one else is making changes to your account without your knowledge. However, the security offered by these notifications can be undermined if other people have access to your email account.

Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site. Even under the best of circumstances, the transmission of information via the internet is not completely secure. Any transmission of personal information is done at your own risk. In the event of a data breach, we will comply with the notification guidelines required by federal law as well as the laws of each state in which we do business.

What can I do to protect my security?

Use a strong password, do not share it, and only log onto your Stilt account from a secured computer with virus protection. You can take several precautions to protect the security of your computer and personal information. Use a unique password that you do not use for any other service. To choose a strong password, avoid using any information that others can easily learn about you, such as a family member's name or birthday, and use special characters in place of letters. Change your Stilt password frequently. Do not share your Stilt password with anyone. Restrict access to the email account you registered with on the Stilt site. Install and regularly update antivirus and firewall software to protect your computer from external attacks by malicious users. Do not log onto

your Stilt account in public areas where the internet is unsecured. Logout and close the browser window when you are finished with a session on the Stilt site.

When this policy applies

This policy applies to information we collect about you in connection with your use of this website, email, text, and other mobile applications, and through the loan application process. When you use the Stilt site, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

Information We Collect

Information we collect while you use our site helps us improve our services. During the loan application process we also request and collect personal and financial information from you, such as your name and address. We collect information when you use Stilt website. We also collect personal and financial information during the registration and loan approval process. Additional information may be gathered during your future use of the site. Information that we collect may include personally identifying information, such as your name, address, email address, telephone number, or social security number. We may also collect financial information such as your income, account balance, payment history, credit history, or credit scores. We and/or our service providers may also collect information that is about you. We and/or our service providers may use this aggregated information in the administration of our Site to improve its usability, evaluate the success of particular marketing/advertising campaigns, and help optimize our Site based on your needs. This may include your internet protocol (IP) address, geographical location, browser type, referral source, length of visit, number of page views, or cookies and anonymous identifiers.

How We Use Information We Collect

- To establish that you are over the age of 18;
- To verify your identity and guard against potential fraud;
- To pull a credit report from a credit bureau, such as Experian, to help determine your creditworthiness;
- To determine your eligibility for a Stilt loan;
- To enable our financial services partners to implement automatic payments and fund transfers;
- To contact you if there is a problem completing a transaction you requested or to discuss a problem with your account;
- To implement collection activities as needed; and/or
- To maintain regular communications with you concerning transactions you initiate, including but not limited to requesting information or assistance, submitting a loan request, and making payments.

More generally, we may use information that we collect from you or that you provide to us:

- To provide, maintain, protect and improve our services, to develop new ones, and to protect Stilt and our users;
- To notify you about changes to the Stilt site or any products or services we offer or provide through it;
- To keep a record of your communication to help solve any issues you might be facing;
- For our marketing purposes to offer our products and services to you, such as advertisements, by us through third parties;
- To offer you tailored content giving you more relevant search results and ads;
- To enforce or apply our Terms of Use, loan agreement, and any other agreements between you and Stilt, including for billing and collection;
- To fulfill any other purpose for which you provide it or otherwise give your consent; and/or
- To comply with any court order, law, or legal process, including retaining personal data or responding to any government or regulatory request.

Changes to Our Privacy Policy

We will post any changes to the Privacy Policy on this page and, if the changes are significant, we will provide a more prominent notice (including, for example, email notification). Your use of the Stilt site following any update to the Privacy Policy means that you accept the updated policy.

This Privacy Policy may change from time to time. We will post any changes to the Privacy Policy on this page and, if the changes are significant, we will provide a more prominent notice (including, for example, email notification). Any updates to this policy become effective when we post the updates on the Site. We will also keep prior versions of this Privacy Policy in an archive for your review. Your use of the Stilt site following the update to the Privacy Policy means that you accept the updated policy.

Contact Information

For additional information, or if you have any questions regarding this policy or the privacy practices at Stilt, please submit your questions or comments directly at:

team@stilt.com

Stilt Inc.

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