

## TERRACOTTA GROUP PRIVACY POLICY

EFFECTIVE DATE: March 23rd, 2015

1. **Introduction.** Terracotta Group, LLC (“us,” “we,” or “Company”) is committed to respecting the privacy rights of its customers, visitors, and other users of the Company Website (the “Site”). We created this Website Privacy Policy (“Privacy Policy”) to give you confidence as you visit and use the Site, and to demonstrate our commitment to fair information practices and the protection of privacy. This Privacy Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy.

### 2. **Information Collection Practices**

#### 2.1. *Types of Information Collected*

(a) **Traffic Data.** We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you but is helpful for marketing purposes or for improving your experience on the Site. We also use “cookies” to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly, and to store your password so you do not have to re-enter it each time you visit the Site.

(b) **Personal Information Collected.** In order for you to access certain services that we offer via the Site, we require you to provide us with certain information that personally identifies you (“Personal Information”). Personal Information includes the following categories of information: (1) Contact Data (such as your name, mailing address, and e-mail address); (2) Financial Data (such as your social security number, tax ID number, and other information we require in order to process your loan requests); and (3) Demographic Data (such as your zip code, age, and income). If you communicate with us by e-mail, post messages to any of our chat groups, bulletin boards, or forums, or otherwise complete online forms, surveys, or contest entries, any information provided in such communication may be collected as Personal Information.

#### 2.2. *Uses of Information Collected*

(a) **Company Use of Information.** We use Contact Data to send you information about our company or our services, or promotional material from some of our partners, or to contact you when necessary. We use your Financial Data to verify your qualifications for services. We use your Demographic Data to customize and tailor your experience on the Site, displaying content that we think you might be interested in and according to your preferences.

(b) **Sharing of Personal Information.** We share certain categories of information we collect from you in the ways described in this Privacy Policy. We share

Demographic Data with advertisers and other third parties only on an aggregate (*i.e.*, non-personally-identifiable) basis. We share Contact Data with other companies who may want to send you information about their products or services, but only if you have specifically requested that we share Contact Data with such companies. We also share Contact Data and Financial Data with our business partners who assist us by performing core services related to our operation of the Site. Those business partners have all agreed to uphold the same standards of security and confidentiality that we have promised to you in this Privacy Policy, and they will only use your Contact Data and other Personal Information to carry out their specific business obligations to Company. If you do not want us to share your Contact Data with any third parties, please email us at      *[e-mail address of website operator]*      or select the “opt out” box on our online forms, but please understand that such a request will likely limit your ability to take advantage of all of the features and services we offer on the Site. In addition, we maintain a procedure for you to review and request changes to your Personal Information; this procedure is described in Section 3.1, below.

(c) User Choice Regarding Collection, Use and Distribution of Personal Information. You may choose not to provide us with any Personal Information. In such an event, you can still access and use much of the Site; however you will not be able to use our services or access and use those portions of the Site that require your Personal Information. If you do not wish to receive information and promotional material from us or from some of our partners, you may email us at [support@terracottagroup.com](mailto:support@terracottagroup.com) or select the appropriate “opt-out” option each time we ask you for Personal Information.

3. ***Confidentiality and Security of Personal Information.*** Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce our Terms of Use. Your Personal Information is stored on secure servers and we take steps to prevent unauthorized third parties from accessing your Personal Information. We provide you with the capability to upload certain information through the website using a third party partner.

3.1. ***User Ability to Access, Update and Correct Personal Information.*** We maintain a procedure in order to help you confirm that your Personal Information remains correct and up-to-date. At any time, you may email [support@terracottagroup.com](mailto:support@terracottagroup.com) to (a) review and update your Personal Information that we have already collected; (b) choose whether or not you wish us to send you information about our company, or promotional material from some of our partners; and/or (c) choose whether or not you wish for us to share your Personal Information with third parties.

3.2. ***Lost or Stolen Information.*** You must promptly notify us if your user name, or password is lost, stolen, or used without permission. In such an event, we will remove that user name, or password from your account and update our records accordingly.

3.3. ***Public Information.*** The Site contains links to other websites. We are not responsible for the privacy practices or the content of such websites. We also make chat rooms, forums, message boards, and news groups available to you. Please understand that

any information that is disclosed in these areas becomes public information. We have no control over its use and you should exercise caution when deciding to disclose your Personal Information.

3.4 *Security of Your Personal Information.* Although we have implemented systems and procedures to secure the data maintained by us, security during Internet transmissions can never be assured. Our policy is to limit access to Personal Information to those employees or agents with a specific need to access or retrieve this information. We store data on multiple service systems, in controlled environments, maintained by third parties who have agreed to maintain the security of those systems. To maintain security, we conduct internal reviews of our security measures on a regular basis. Remember, however, that any Personal Information you post on the internet is available to anyone.

4. *How We Use Cookies and Web Beacons.* Your Web browser offers so-called "cookies" which, if you allow their use, store small amounts of data on your computer when you visit a website. A "web beacon" is an embedded image file that specifically helps us track whether you have viewed a specific piece of content. Cookies do not contain any Personal Information about you and therefore cannot be used to identify you personally. However, cookies assist us in tracking which of our features you like best and make it easier to use our Website. You have the ability to accept or decline cookies by modifying your browser. Our Website is viewable even if you disable the cookie function on your browser. However, if you disable cookies, some advanced and customized features or offerings will not be available to you. We also use "cookies" to remember information you gave us so you don't have to re-enter it each time you visit the site.

Most browsers are initially set to accept "cookies". If you'd prefer, you can set yours to refuse "cookies". You may not be able to use our service if you turn off the "cookies" option.

5. *Children's Privacy.* None of the information on the Site is intended for the use of children under 13, and we do not knowingly register any person or accept information from any person under the age of 13.

6. *Changes in Corporate Structure.* In developing our business, we may engage in the sale of certain assets and the company itself, or parts of it, may be sold, merged or otherwise transferred. In such transactions and changes in ownership, user information, whether personally identifiable or otherwise, may constitute one of the transferred assets. We will notify affected users in accordance with the procedure for changing this Privacy Policy.

7. *Visitors and Customers Outside the United States.* Our Website and the servers that make this Website available worldwide are located in the United States. Any information you provide in subscribing to our Website or registering at our Website may be transferred to the United States.

8. ***Do Not Track Notice.*** We do not track users and customers of the Site over time and across third party websites to provide targeted advertising and therefore do not respond to Do Not Track signals. You should be aware that some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

9. ***Your California Privacy Rights.*** Under California Civil Code §§ 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of Personal Information we share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: Terracotta Group, LLC, 2321 Rosecrans Avenue, Suite 3270, El Segundo, CA 90245, via email, to support@terracottagroup.com. In your request, please specify that you want a "Your Teracotta Group California Privacy Rights Notice". Please allow at least 30 days for a response.

10. ***Updates and Changes to this Privacy Policy.*** We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site.

11. ***Contact Information.*** If you have any questions about this Privacy Policy or our privacy practices, please contact us at support@terracottagroup.com and be sure to include the URL of the Website involved in your request. You can also contact us by mail at:

Teracotta Group, LLC  
2321 Rosecrans Avenue, Suite 3270  
El Segundo, CA 90245  
Attn: \_\_\_\_\_