



Verdant Commercial Capital, LLC Privacy Policy

Effective date: November 4, 2024

Purpose: In the course of our business activities, VCC must collect and process personal data of its customers, potential customers, suppliers, business associates, and employees. This privacy policy (“Policy”), which is posted on VCC’s website at www.verdantcommercialcapital.com (the “Website”), describes how and why we process Personal Data and the measures we take to protect the privacy of the data subjects and remain compliant with relevant data protection laws.

Scope: This policy applies to Verdant Commercial Capital, LLC, and its subsidiaries.

I. Introduction

Your privacy is important to Verdant Commercial Capital, LLC (“VCC” or “we” or “our”). This Policy explains what Personal Data we collect from you, why we collect and process your Personal Data, when and with whom your Personal Data is shared, and your rights with respect to your Personal Data.

In this Policy the term “Personal Data” means data that identifies or may be used to identify an individual person, including, but not limited to, a person’s name, date of birth, social security number, driver’s license, job title, address, email, phone number, employer, or any other information considered to be “Personal Data” or “Personal Information” under applicable consumer data privacy law or regulation.

In order to provide outstanding service, we must collect, maintain and process certain Personal Data about our customers, suppliers and other business contacts. We recognize and respect your privacy concerns and expectations about how we use this information. We want you to know about our privacy policies and practices, and what we do to protect your Personal Data.

II. Personal Data We Collect

In order to carry out our business and to fulfill our contractual obligations, VCC must collect and process Personal Data of employees of prospective and existing customers or suppliers. Examples of the types of Personal Data that VCC may collect from its customers, suppliers and other business contacts are:

- Name, title, address, email, and telephone number
- Copies of driver’s licenses or other government issued identification
- Tax identification numbers
- Signatures on legal contracts

- Payment information
- Cell phone geolocation data
- Financial statements or other financial information

III. Collecting Information

We may gather confidential information from the following sources: credit applications and other financial forms, which may contain information such as your name, address, social security number, ACH bank information; credit reporting agency reports, such as creditworthiness and credit history information to help us with customer authentication, payment processing and credit-related decisions; and data from your use of our websites. When you visit our Websites, we automatically collect information on the type of device you use, operating system version, and the device identifier (or “UDID”), as described in more detail in the section entitled “Personal Data We Collect on our Websites”

In all cases in which you submit Personal Data to us, you may tell us that you do not want us to use this information to make further contact with you beyond fulfilling your requests, and we will respect your wishes. If you give us Personal Data about someone else, such as a spouse, a reference, or a work colleague, we will assume that you have obtained that person’s permission to do so. In any case, we will only retain your Personal Data for as long as we have a legitimate and lawful reason to do so.

IV. Personal Data We Collect on our Websites

When you visit our Websites, VCC may collect certain Personal Data by various means, such as web beacons, cookies, and other technologies that are sent to and stored on your hard drive. These tools will automatically collect and log web usage data from when you visit the Website. Information, including your IP address, referring website, pages viewed, and length of visit, informs us about how you use and navigate the Website and helps us monitor, customize, and enhance your experience on the Website.

Specifically, Cookies tell website operators to recognize your computer when you revisit a site. Cookies help to improve the use of the Websites. Cookies also allow Websites to analyze aggregate traffic on the site, in order to streamline navigation and keep the content fresh for all visitors. The cookies we use do not read or transmit any data on your computer’s hard drive. We do not use cookies to identify or track a user’s activity outside of our Websites. Such usage information is not Personal Information unless it is associated with other information by which you can be personally identified. Most browsers are initially set to accept cookies. You can set your browser to notify you when you have received a cookie, giving you the opportunity to decide whether to accept it. You have the option to reject our cookies, but you may not be able to access or use parts of, or the entire, Website.

Regardless of cookies, all web-browsers transmit the IP address of the computer on which they are running. For most users accessing our websites from an Internet Service Provider (ISP), the IP address will be different every time you log on. IP addresses may be used for various purposes, including to: (1) diagnose service or technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific Web company or ISP, (2) develop the most appropriate advertising based on geographic area or information derived from IP addresses, (3) estimate the total number of users visiting VCC from specific countries or regions of the world,

(4) assist VCC to track visits to our Web site, and (5) help determine which users have access privileges to certain VCC Website content.

We may use third parties, such as Google Analytics, to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms, and other engagement data) in order to evaluate and improve the user experience and the Website. To prevent the storage and processing of this information (which includes your IP address) by Google, you may download and install the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You may also obtain additional information on Google Analytics' data privacy and security practices at the following link: <https://policies.google.com/technologies/partner-sites>.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do link this automatically collected data to other information we collect about you.

Technologies such as cookies, beacons, tags and scripts are used by VCC and our service providers (Google, Microsoft, ActiveCampaign, Marketo, Pardot, INKY), affiliates, or analytics (Google Analytics, Microsoft Analytics) and are used in analyzing trends, administering the site, tracking users' movements around the site and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We also use mobile analytics software to allow us to better understand the functionality of our Websites on mobile devices. This software may record information such as how often you use the site, the events that occur within the site, aggregated usage, performance data, and where the mobile site was accessed from. We do not link the information we store within the analytics software to any personal information you submit within the mobile site.

We use Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our websites or to display advertising based upon your web browsing activity also use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.

We partner with a third party to either display advertising on our websites or to manage our advertising on other sites.

V. Protecting your Data

We take seriously our obligation to safeguard your confidential Information, including your Personal Data (collectively, "Information"). Information is accessible only to employees who use it in order to provide products or services to you and your company and are held to standards of professionalism and integrity that includes using and disclosing customer data only for VCC's use in assessing your and your company's creditworthiness and providing you with the best products and services VCC offers. While no method of transmission over the Internet or electronic storage is 100% secure and we cannot guarantee its absolute security, we maintain physical, electronic, and procedural safeguards to protect the confidentiality of your Information. When you enter sensitive information (such as a Social Security number) on our applications, we encrypt the

transmission of that information using secure socket layer technology (SSL). If you have any questions about security on our websites, you can contact us at info@verdantcc.com.

VI. **Why We Collect Personal Data**

VCC only collects Personal Data for lawful purposes. These include:

- A. To provide customers with our products or services
- B. To facilitate the approval of transactions
- C. To provide information on equipment leasing and finance
- D. To respond to requests from the customer, financier, or supplier
- E. To detect or prevent fraud
- F. To assess or manage risk
- G. To perform internal audits
- H. To confirm the location of equipment financed by VCC
- I. To comply with anti-terrorism, anti-bribery, or anti-money laundering laws or other laws
- J. To comply with legal process, subpoenas, or other requests from government bodies
- K. As part of a sale, merger, acquisition, or similar change of control
- L. To ensure data security

VII. **Our Data Protection Principles:**

VCC will treat your Personal Data as confidential. We respect your right to privacy. In all cases in which we collect your Personal Data according to this Policy, we will abide by the following principles:

- We will only collect your Personal Data with your full knowledge
- We will only collect and keep your Personal Data for a lawful purpose
- We will only keep that Personal Data which is necessary for the lawful purpose
- We will only keep your Personal Data for as long as the lawful purpose exists
- We will keep your Personal Data accurate to the extent it is reasonably practicable to do so
- We will store your Personal Data securely to prevent unauthorized or unnecessary disclosure
- We will process your Personal Data in accordance with your rights under the relevant data protection laws
- We will not transfer your Personal Data outside of its country of origin unless adequate protections are in place

VIII. **Transfer or Sharing of Your Personal Data**

Subject to the above Data Protection Principles and the terms of any existing non-disclosure agreement, VCC may transfer or share your Personal Data in the following circumstances:

1. Among our affiliates and wholly-owned subsidiaries for the lawful purposes described in this Policy;
2. To third parties such as our banks, financiers, agents, and suppliers in order to deliver our services or to fulfill or enforce a contract;

3. To our attorneys, auditors, IT professionals or other third-party service providers for the lawful purposes described in this Policy;
4. To the vendors and/or manufacturers of equipment and products that you have selected for acquisition and possession in connection with our financing and/or leasing of such equipment and products to you;
5. To our funding partners in connection with any further assignment or syndication of a finance or lease contract; and
6. To government, regulatory, judicial or law enforcement bodies in response to official requests.

VCC may also utilize cloud-based customer relationship management or IT service providers to store and process Personal Data. In all cases, VCC will take reasonable steps to ensure that adequate technical and organizational measures are in place so that the transfer and storage of your Personal Data is secure from unauthorized disclosure, alteration or deletion.

VCC does not sell, share, rent, or disclose your Personal Data to third parties for any marketing purposes.

IX. Protecting Disclosure of Information to Non-Affiliated Third Parties.

We do not share, sell, or lease your Personal Data to any non-affiliated third parties for their marketing use. We may share Personal Data with other companies hired to provide services for us such as ordering credit bureaus, sending emails, and processing payments. These companies – our vendors – are contractually bound to use the Personal Data we share with them only to perform the services we have hired them to provide. We will release your Personal Data to a third-party if you direct us to do so, if we are required by law to do so, or in other legally limited circumstances (for example, to protect your account from fraud).

X. U.S. Patriot Act

To help the United States government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions, including commercial lenders and entities extending credit, to obtain, verify, and record information that identifies each person and business that seeks a business loan or other extension of credit. What this means for you: When you apply for a loan, line of credit, or equipment financing, we will ask for your business name, address, and Tax Identification Number. We will also ask for your name, address, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents and will retain that documentation in compliance with federal laws and regulations.

XI. Children

The Websites are not intended for visitors under 18 years of age ("Children"). We do not knowingly solicit or collect Personal Data from or about Children, nor do we knowingly market our products or services to Children. While we do not seek to obtain, nor wish to receive, Personal Data directly from Children, we cannot always determine the age of persons who access and use our Website. If a Child provides us with their Personal Data, we encourage the parent or guardian to contact us at info@verdantcc.com to request the Personal Data be deleted.

XII. Links to Other Websites

The Website may contain links to other websites for your convenience and information. Third-party websites accessed through links on our Website have separate privacy and data collection practices and security measures. We have no responsibility or liability for the practices, policies, and security measures implemented by third parties on their websites. We encourage you to review the relevant third-party privacy notices and contact the third parties to ask questions about their privacy practices, policies, and security measures before disclosing any Personal Data.

XIII. Notices and Revisions

We may amend this Notice from time to time, without notice to you, in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our visitors, properties, strategic marketing partners, and service providers. Updated versions will be posted to the Website and the “Last Updated” date at the bottom of this Notice will be revised so you are aware of when the Notice was last updated. If we materially change how we use your Personal Data, we will notify you and request your consent as required before using the Personal Information in a different manner.

XIV. Contact VCC

To “opt out” or make other choices about your Personal Data or to exercise your rights, please email info@verdantcc.com or call 1-513-769-2033.

XV. Additional Information for California Residents

This additional information is intended for California residents and is being provided in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively the “CCPA”). The CCPA sets forth certain rights of California residents regarding their Personal Information. Unless stated otherwise, capitalized terms shall have the meaning ascribed to them in the CCPA and any Regulations adopted pursuant thereto. For purposes of consistency, the CCPA’s definition of “Personal Information” is referred to herein as Personal Data.

A. Identification of the categories of Personal Data collected in the preceding 12 months, the business purpose for collecting such Personal Data, and the Third Parties to whom the Personal Data has been disclosed for a business purpose:

Category	Examples	VCC’s Purpose for Collecting as set forth in Section VI	Third Party Recipients as set forth in Section VIII
Personal Identifiers	Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	A,B,C,D,E, F,H,I,J,K, and L	1,2,3,4,5 and 6

Personal Information	Signature, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	A,B,C,D,E,F,H,I,J,K, and L	1,2,3,4,5, and 6
Characteristics of Protected Classifications	Characteristics of protected classifications under California or Federal law, including but not limited to, race, sex, national origin, age, disability, and marital status.	A,B,E,F,I,J, and K	1,2,3,4,5 and 6
Commercial Information	Products and services purchased, obtained, or considered and consuming history.	A,B,C,D,E,F,G,H,I,J, and K	1,2,3,4,5 and 6
Internet or other Electronic Network Activity Information	Browsing history, cookies, and information regarding interaction with an internet website application.	A,B,E,F,G,I, and L	1 and 3
Geolocation Data	Device Location.	A,B,E,F,H,I and K	1,3,4 and 5
Professional or Employment Related Information	Employment history and other information from background or credit-related checks.	A,B,E,F,I,J, and K	1,2,3,4 and 5
Sensitive Personal Information	Social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or	A,B,E,F,G,H,I,J,K and L	1,2,3,4,5 and 6

	philosophical beliefs, or union membership.		
--	---	--	--

B. Identification of the categories of sources from which the Personal Data is collected: see Personal Data We Collect from Customers and Suppliers in Section IV above.

C. Identification of the specific business purpose for disclosing Personal Data to Third Parties: see Transfer or Sharing of Your Personal Data in Section VII above.

The CCPA defines a “sale” as the transfer of Personal Data to a third party for monetary or other valuable consideration and it defines “share” as the transfer of Personal Data to a third party for cross-context behavioral advertising. In the preceding 12 months, VCC has not sold or shared Personal Data. Likewise, VCC has not sold or shared the Personal Data of any consumer under the age of 16.

VCC does not use or disclose Sensitive Personal Data for purposes other than those that are reasonably necessary and proportionate to performing the services or providing the goods reasonably expected by an average consumer who requests those goods or services and performing services on behalf of the business.

The CCPA confers the following rights on consumers regarding their Personal Data:

1. The right to know and access what Personal Data VCC has collected about them, including the categories of Personal Data, the categories of sources from which the Personal Data is collected, the business or commercial purpose for collecting, selling, or sharing Personal Data, the categories of third parties to whom the business discloses Personal Data, and the specific pieces of Personal Data the business has collected about them.
2. The right to request that VCC delete Personal Data that VCC has collected from them, subject to certain exceptions.
3. The right to request that VCC correct inaccurate Personal Data that VCC maintains about them.
4. The right not to receive discriminatory treatment by VCC for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.
5. The right to know what Personal Data is sold or shared and the right to opt-out of such. VCC does not sell or share Personal Data.
6. The right to limit the use and disclosure of Sensitive Personal Data other than what is necessary to perform the services or provide the goods you request. VCC does not use or disclose Sensitive Personal Data for purposes other than those that are reasonably necessary and proportionate to performing the services or providing the goods reasonably expected by an average consumer who requests those goods or services and performing services on behalf of the business.

Consumers may exercise their rights by calling 1-513-769-2033 or emailing info@verdantcc.com. Any requested submission will need to be verified before being honored. Such verification may include, but is not limited to, contacting the owner of the Personal Data or requesting information related to the consumer's interactions with us. Unless an extension is needed, VCC will honor a verified request within 45 calendar days of receipt. If we need to extend the time period to respond to a verified request, we will notify you of this extension and the reason for the extension within the original 45 calendar day timeline.

Consumers may use an authorized agent to submit a request on their behalf if they provide the authorized agent written permission signed by them. We may deny a request from an authorized agent if the agent does not provide us the signed permission demonstrating that they have been authorized by the consumer to act on their behalf.

Please direct any questions or concerns about this privacy policy to info@verdantcc.com.

XVI. Certain Jurisdictional Privacy Rights

Residents of certain jurisdictions, such as but not limited to, Colorado, Connecticut, Delaware, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, and Virginia, may have additional rights with respect to their Personal Data. For information relating to these rights, please contact us at info@verdantcc.com.