

# Online Privacy Policy

Last updated: January 25, 2019

This Online Privacy Policy (“Policy”) explains how Milo Credit, LLC and Milo Holdings, Inc. (“Milo Credit”, “we” or “us”) collects and processes your Personal Data that we receive when you access our website at <https://www.milocredit.com> (the “Site”).

When reviewing this Policy, the following terminology may be helpful:

- **“Personal Data”** is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.
- **“Special Category Data”** is a type of Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning sex life or sexual orientation.
- **“Processing”** is anything Milo Credit or its vendors do with Personal Data, such as collecting, storing, recording, holding, adapting, retrieving, disclosing, and destroying it.

Please read this Policy carefully. By accessing and/or using the Site, you acknowledge that you have read, understood, and agree to the practices and procedures in this Policy. If you do not agree, your choice is not to use the Site.

## I. Who We Are

For the purposes of the General Data Protection Regulation 2016/679 (the “GDPR”), the Data Controller is Milo Credit, LLC, registered in Delaware with a registered address at 78 SW 7<sup>th</sup> St, Suite 500, Miami, FL 33130.

Our nominated representative for the purposes of the GDPR is [Josip Rupena].

Our Data Protection Officer is Josip Rupena who can be contacted by sending an email to [compliance@milocredit.com](mailto:compliance@milocredit.com) or by post to 78 SW 7<sup>th</sup> St, Suite 500, Miami, FL 33130.

## II. How to Contact Us

If you have any questions about this Policy, please feel free to contact us at by email at [compliance@milocredit.com](mailto:compliance@milocredit.com), by phone at 888-433-6456, or by post at 78 SW 7<sup>th</sup> St, Suite 500, Miami, FL 33130.

## III. How We Collect Your Personal Data

### Information that you give us voluntarily

We may collect and process the following information that you give us voluntarily (and which may include Personal Data and Special Category Data):

- **Contact information**, which you provide when you correspond with us by phone, email, or otherwise; when you contact us through the Site, for instance by using the Site chat or email request functions; when you participate in discussion boards or other social media functions through our Site; and/or when you report a problem with our Site. The contact information you give us may include your name, email address, phone number, and/or physical address.
- **Personal and financial information**, which you provide when you create an account through the Site or when you apply for credit or any other financial product or service through the Site. The personal information you give us may include your contact information, social security number or other identification number; nationality; date of birth; property address or other information; marital status; and/or any combination of this information that could be used to identify you. The financial information you give us may include your bank account and routing numbers; credit or debit card numbers; household income; credit score; and/or other credit report information.

### Information collected from you automatically

We and our third party service providers may use automatic data collection technologies to collect information from you as you use the Site, including information about your online activities over time and across third party websites or other online services.

#### *Types of information collected automatically*

Any time you access and/or use the Site we will automatically collect the following information:

- **Technical information**, including the type of device you are using; the Internet protocol (IP) address used to connect your computer to the Internet; browser type and version; browser plug-in types and versions; operating system and platform; language preferences; and/or time zone setting.
- **Site usage information**, including pages you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); methods used to browse away from the page; and/or any phone number used to call our customer service number.
- **Location information**. Milo Credit asks mobile users whether they will permit us to collect information about their location. We collect location information only from mobile users who have agreed to provide that information.

For information about the choices you may have about data collected using automatic data collection technologies, please see the section on **Your Information Collection Choices** below.

### *Types of automatic data collection technologies we use*

The Site currently uses the following automatic data collection technologies to collect information from you automatically:

- **Cookies.** Like many websites, our Site uses cookies to distinguish you from other users of the Site. A cookie assigns a unique identification to your computer and is typically stored on your computer's hard drive. Cookies allow us to collect information about the details of your visits to the Site, which may include technical information, site usage information, and/or location information. Please see the section on **Your Information Collection Choices** below for more information on how you can manage your cookie preferences.

We may use our own cookies to collect information as well as cookies provided by certain advertising and web analytics third party service providers, such as Google AdWords; and/or Google Analytics. For more information about how Google uses this data, please visit <https://policies.google.com/technologies/partner-sites>.

- **Pixels, web beacons, and other online technology.** When you visit the Site or view one of our emails, we may use pixel tags or "clear" gifs to track links and/or similar technology to note some of the pages you visit on our Site and to personalize your experience. Pixel tags are a technology similar to cookies that can be embedded in online content or within the body of an email for the purpose of tracking activity on websites (for example, to know when content has been shown to you), or to know when you have viewed particular content or a particular email message.

### Information we receive from other sources

We may also collect information about you from third parties, including:

- **Social media account information.** Our Site allows users to register or create an account using their social media profile. If you select this option, we will automatically collect selected Personal Data about you from your social media profile. The Personal Data we collect depends on your privacy settings for sharing such Personal Data, and may include your name, profile picture, age range, gender, language, country, and/or other public information.
- **Information from our group.** This is information we receive about you if you use any of the other websites (operated by us, or another member of our group) or use any other services provided by another member of our group or us.
- **Information from trusted third parties.** We may also receive your Personal Data from trusted third parties (including, for example, business partners, sub-contractors in technical, payment and delivery of membership services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

## IV. How We Use Your Personal Data

We will only process your Personal Data, including sharing it with third parties, where: (1) you have provided your consent which can be withdrawn at any time; (2) the processing is necessary for the performance of a contract to which you are a party; (3) we are required by law; (4) it is required to protect your vital interests or those of another person; or (5) it is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

We will only process Special Category Data on the legal basis of: (1) your explicit consent; (2) employment or social security and social protection law requirements; (3) protecting your vital interests or those of another person; (4) the establishment, exercise, or defense of legal claims; (5) reasons of substantial public interest; (6) medical and healthcare purposes; or (7) where you have made such data public.

We may use Personal Data for the following purposes:

### Personal Data you give to us voluntarily

- To carry out our obligations arising from your account with us, or any other contract entered into between you and us, and to provide you with the information, products, and services that you request from us;
- To otherwise fulfill the purposes for which you provide it;
- To respond to your questions and inquiries and provide related account services;
- To provide you with information about other events, products, or services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- To provide you, or permit selected third parties to provide you, with information about events, products, or services we feel may interest you, provided you have given your consent;
- To notify you about changes to your account or our services; and
- To ensure that content from our site is presented most effectively for you and your computer.

### Personal Data collected from you automatically

- To administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Site to ensure that content is presented most effectively for you and your computer;

- As part of our efforts to keep our Site safe and secure;
- To make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To present you with tailored advertising. Please see the section on **Advertising** below for more information.

#### Personal Data we receive from other sources

- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined Personal Data for the purposes set out above (depending on the types of information we receive).

We may also process your Personal Data as required by law or based on our good faith belief that it is necessary to conform or comply with the law or to protect the users of the Site, the Site, or the general public.

## **V. Advertising**

We may use your information to contact you in the future to tell you about products or services we believe may be of interest to you. If we do, each marketing communication we send you will contain instructions permitting you to “opt-out” of receiving future marketing communications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us using the **How to Contact Us** section above.

We use web beacons to tell when a user is redirected to the Site because of an advertisement that we ran was clicked on or otherwise interacted with and to better target our advertisements (known as “retargeting”). Our service providers may track Site visitors across multiple websites and social media services to retarget Site visitors. Users logged in to social media programs may be tracked by service providers who track such users across multiple websites and who may disregard the privacy settings in your web browsers.

## **VI. How We Share Your Personal Data**

We may share information that is not your Personal Data without restriction, including aggregate information about visitors to the Site and information that does not identify any individual.

We may share your Personal Data for the purposes described in this Policy:

- With our affiliates;

- With our service providers who assist us with the Site or otherwise perform support services for us;
- To another business entity in the event of a merger, restructuring, acquisition, any other sale or transfer of our assets or liabilities, or any change in ownership control; and/or
- To anyone with your consent.

## **VII. International Data Transfers**

We will not transfer Personal Data, relating to individuals within the European Economic Area (“EEA”), to third parties located outside of the EEA without ensuring adequate protection under European law. Where a third party is located in a country not recognised by the EU Commission as ensuring an adequate level of protection, we will take appropriate steps, such as implementing standard contractual clauses recognised by the EU Commission, to safeguard your Personal Data.

## **VIII. Your Information Collection Choices**

You can limit some of the tracking mechanisms that automatically collect information about your use of the Site, such as by setting your browser to opt out of cookies.

### Cookie opt-outs

When you first access the Site, you will receive a message advising you that cookies are in use. By continuing to browse the Site, you agree to our use of cookies as described in this Policy.

You can refuse to accept cookies by setting your browser to refuse all or some browser cookies, or to alert you when cookies are being set. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept cookies, you may experience some inconvenience in your use of the Site and some online products and services. For example, some parts of the Site maybe inaccessible or not function properly. You also may not receive tailored advertising or other offers from us that may be relevant to your interests and needs. For more information about cookies and how to manage or delete them, please visit <http://www.allaboutcookies.org/>.

### California Do Not Track disclosure

Our Site currently does not respond to “Do Not Track” signals. For a description of “Do Not Track” information for browsers and mobile devices, and information about opt out programs that third party advertising companies participate in, please visit <https://allaboutdnt.com/>.

## **IX. Your Data Protection Rights**

You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data

for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right by contacting us using the **How to Contact Us** section above.

Under European data protection law, in certain circumstances, you have the right to:

- Request access to any Personal Data we hold about you (“Subject Access Request”) as well as related information, including the recipients or categories of recipients to whom the Personal Data has been shared;
- Obtain without undue delay the rectification of any inaccurate Personal Data we hold about you;
- Request Personal Data held about you to be deleted, provided the Personal Data is not required by Milo Credit for compliance with a legal obligation under European or Member State law or for the establishment, exercise, or defence of a legal claim;
- Prevent or restrict processing of your Personal Data, except to the extent processing is required for the establishment, exercise or defence of legal claims; and
- Request transfer of Personal Data directly to a third party where this is technically feasible.

In addition, where you believe that Milo Credit has not complied with its obligations under this Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner’s Office.

You can exercise any of these rights by contacting us using the **How to Contact Us** section above.

## **X. Additional Information**

### Data Retention

We will store your Personal Data, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your Personal Data quickly upon request.

### Data Storage and Security

We store all your Personal Data on our secure servers.

We use appropriate measures, including advanced technology, to protect Personal Data collected online from unauthorized access or disclosure. These measures may include transmission through Secure Socket Layer technology, encryption, physical access security, and other appropriate technologies. We review and enhance our security measures as necessary. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### Links to third party websites

We may create links to third party websites, including in the form of widgets (e.g., social share buttons) that enable users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on the Site where these widgets are placed.

We do not evaluate and are not responsible for the privacy practices or content of third party websites, including the websites of our affiliates. We encourage you to review the privacy policies of each link to ensure that you are comfortable with their privacy practices.

#### Privacy of children

The Site is not directed at persons under the age of 18, and Milo Credit does not knowingly collect or maintain information provided online by persons under the age of 18.

## **XI. Changes to This Online Privacy Policy**

We may make changes to this Policy from time to time. Should we make a material change to our information collection and processing practices, we will let you know by updating this Policy and revising the “Last Updated” date. Such changes will be applied only to information collected on a going forward basis. Your continued use of the Site following the posting of any changes to this Policy indicates your acceptance of the new terms.