California Privacy Policy

California Residents: On January 1, 2020, the California Consumer Privacy Act of 2018 (CCPA) became operative. Under the CCPA, covered businesses that collect the personal information of California residents must provide notice regarding their data collection and sharing practices. In addition, the CCPA provides California residents the right to make certain requests with respect to their data.

In the following CCPA Disclosure, the words "we," "us," and "our" refer to MRV Banks, and the terms "you" and "your" refer to California residents who are customers of MRV Banks. The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Disclosure does not apply with respect to personal information that we collect about California residents in connection with providing our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (GLBA)).

California Privacy Rights

Personal Information We Collect.

We collect the following categories of personal information:

- (i) Identifiers such as your name, address, telephone number, Internet Protocol address, email address, driver's license number, social security number, employment history, signatures, or other similar identifies.
- (ii) Certain personal characteristics, such as your gender, age, race, color, national origin and marital status.
- (iii) Internet activity information, such as your browsing history, search history, or your interactions with our website or the Grow Credit mobile application.
- (iv) Geolocation data.
- (v) Professional or employment-related information.

We collect your personal information using various sources, including your interactions with our website, the information you provide to apply for a product or service from us, and information obtained from cookies, pixel tags, web beacons, server logs, or other similar technologies. We collect your personal information to provide the products or services requested by you, to contact you regarding our products and services, and to otherwise enhance your experience with us. As disclosed in our Privacy Policy, we may share your personal information for our everyday business purposes (such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus) and for our marketing purposes to offer our products and services to you. We may also share information about your transactions and experiences with us with our affiliates for their everyday business purposes.

Your Right to Make Requests.

California law permits residents of California to request certain details about how their information is collected, disclosed, and sold to third parties.

Under the CCPA, California residents have the right to:

• Request that a business delete any personal information about the consumer which the business has collected from the consumer.

- Request that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:
 - The categories of personal information that it has collected about that consumer. The categories of sources from which the personal information is collected.
 - The business or commercial purpose for collecting or selling personal information.
 - The categories of third parties with whom the business shares personal information.
 - The specific pieces of personal information it has collected about that consumer.
- Request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to the consumer, free of charge, the following:
 - \circ The categories of personal information that the business collected about the consumer.
 - The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
 - The categories of personal information that the business disclosed about the consumer for a business purpose.
- Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

We do not sell your personal information to third parties or disclose your personal information to third parties for a business purpose. To exercise any of your other rights above, you may contact us by calling us toll-free at 1-833-690-2471 or by emailing us at help@coign.com. We may request up to three pieces of personal information about you when you make a request to verify your identity. Only you, or an authorized agent acting on your behalf, may make a verifiable consumer request related to your personal information. To use an authorized agent to submit a request to us, you must (i) provide the authorized agent signed permission to make a request on your behalf; (ii) verify your identity with us; and (iii) directly confirm with us that you provided the authorized agent permission to submit the request.

We will verify your consumer request by comparing the information you provide to us against our records, which may include requesting that you provide us with your name, address, and phone number.

You have the right not to be discriminated against for your exercise of the privacy rights conferred by the CCPA. We will not discriminate against a consumer because the consumer exercises any of the consumer's rights as described in this CCPA Disclosure. However, we reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified, to the extent your rights adversely affect the rights and freedoms of others, or where the CCPA allows us an exemption, such as when we are required to comply with federal, state, or local laws.

Contact Us.

If you should have any questions or concerns about this CCPA Disclosure or our privacy practices, please contact us 833-690-2471 or by emailing us at help@coign.com.