

# Credzu’s Privacy Policy

When we say “**Credzu**,” we mean Credzu, LLC, and any of its affiliates. When we say “**Site**,” we mean [www.credzu.com](http://www.credzu.com), and when we say “**Service**,” we mean the Site plus any websites, features, applications, widgets, or online services owned or controlled by Credzu that post a link to this Privacy Policy.

As part of the Service, Credzu provides a marketplace that results in platform information pertaining to different parties to an interaction. Users of the Service may be **Credit Service Buyers**, **Credit Service Sellers**, or **Site Visitors** (as each is defined in the User Agreement). This Privacy Policy applies to Credzu’s processing of personal information of Users where Credzu determines the purposes and means of processing. It does not apply to processing of information by Users themselves, who may be controllers of the personal information they access through the Service. For information about how Users process your personal information, please contact them directly.

## 1. INFORMATION COLLECTION

### 1.1. Information You Provide to Us

Depending upon our relationship with you as well as your account type, we may collect the following categories and types of personal information from and about you:

Categories of Personal Information We Collect	Examples of Personal Information Collected	Categories of Sources of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Name, Date of Birth, Social Media Account Information, Profile Data, IP Address	Directly from You or Your use of the Service; Cookies and Other Tracking Technologies; Third Parties (such as affiliates, agents, service providers, and other users)	Developing, Improving, and Providing the Service, Identification, Communications, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
Contact / Account Profile Information	Email Address, Home Address, Billing Address, Phone Number	Directly from You or Your use of the Service; Third Parties (such as affiliates, agents, service providers, and other users)	Developing, Improving, and Providing the Service, Identification, Communicating with You, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
Sensitive Personal Information / Government-Issued Identification Numbers	Social Security Number, Driver’s License, State Identification, Tax Identification Number, Immigration Status, Citizenship Information	Directly from You	Improving and Providing the Service, Verifying Your Identity, and Detecting Fraud, Identity Theft, or Other Misuse of Your Account, Legal, Compliance, and Regulatory Obligations.
Commercial Information	Transaction Data including services offered, considered, or purchased	Directly from You or Your use of the Service; Third Parties (such as affiliates, agents, service providers, and other users)	Developing, Improving, and Providing the Service, Identification, Communications, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
Financial Data/Payment Information	Credit reports, credit scores, and financial account information	Directly from You or Your use of the Service; Third Parties (such as affiliates, agents,	Improving and Providing the Service, Identification, Communications, Security,

		service providers, and other users)	Legal, Compliance, escrow disbursements, and Regulatory Obligations.
<b>Internet or Other Network or Device Activities, Including Information from Cookies</b>	Unique device and app identifiers, browsing history or other usage data, the browser and operating system you are using, the URL or advertisement that referred you to the Service, the search terms you entered into a search engine that led you to the Service, areas within the Service that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites	Directly from You or Your use of the Service; Cookies and Other Tracking Technologies; Third Parties (such as affiliates, agents, service providers, and other users)	Developing, Improving, and Providing the Service, Identification, Communications, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
<b>Approximate Geolocation Information</b>	Your approximate location	Directly from You or Your use of the Service; Cookies and Other Tracking Technologies; Third Parties (such as affiliates, agents, service providers and other users)	Developing, Improving, and Providing the Service, Identification, Communications, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
<b>Platform Communications</b>	Communication Information (e.g., your name, contact information, and, with your consent, the contents of any messages you send)	Directly from You, Your use of the Service, and Users with whom you communicate	Developing, Improving, and Providing and Improving the Service, Security, Legal, Compliance, and Regulatory Obligations.
<b>Professional Information</b>	Previous place(s) of employment, position(s), and work history	Directly from You or Your use of the Service; Service Providers; Third Parties (such as other users)	Developing, Improving, and Providing the Service, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.
<b>Other information that identifies or can be reasonably associated with you</b>	User-generated content (e.g., community posts, feedback, ratings, and job performance and outcomes), photographs, examples of your work, information on work previously performed via the Service and outside the Service, compensation rates, and earnings information	Directly from You or Your use of the Service; Service Providers; Third Parties (such as affiliates, agents, and other users)	Developing, Improving, and Providing the Service, Identification, Communications, Marketing, Analytics, Security, Legal, Compliance and Regulatory Obligations.

## 1.2. Non-Identifying Information and De-Identified Information

- **Non-Identifying Information/Usernames:** We also may collect other information that does not identify you directly, such as zip codes, demographic data, information about your use of the Service, and general project-related data (“**Non-Identifying Information**”). We may combine information collected from Credzu users, whether registered or not (“**Credzu Users**”).
- **Combination of Personal and Non-Identifying Information:** We may combine your Personal Information with Non-Identifying Information, but Credzu will treat the combined information as Personal Information.
- **De-Identified Information:** We may also de-identify or aggregate information and convert it into non-personal information so that it can no longer reasonably be used to identify you (“**De-Identified Information**”). We may use De-Identified Information for any purposes described in the “We Use Information We Collect” section below. We will maintain and use De-Identified Information in de-identified form and will not attempt to reidentify the information, except to confirm our de-identification processes or unless required by law.

### 1.3. Information Collected Automatically

Credzu and its partners use cookies or similar technologies to analyze trends, administer the website, track users’ movement around the website, the desktop app, and the mobile app, and to gather demographic information about our user base as a whole. The technology used to collect information automatically from Credzu Users may include cookies, web beacons, and embedded scripts. In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

For further information on cookies and how they are used for the Service, please visit our Cookie Policy at <https://credzu.com/tos/cookies/>.

### 1.4. Analytics Providers, Ad Servers and Similar Third Parties

Credzu works with (or may in the future work with) ad networks, ad agencies, analytics service providers and other vendors to provide us with information regarding traffic on the Service, including pages viewed and the actions taken when visiting the Service; to serve our advertisements on other websites, within mobile apps and elsewhere online; and to provide us with information regarding the use of the Service and the effectiveness of our advertisements. Our service providers may collect certain information about your visits to and activity on the Service as well as other websites or services, they may set and access their own tracking technologies on your device (including cookies and web beacons), and may use that information to show you targeted advertisements. Some of these parties may collect Personal Information when you visit the Service or other online websites and services. We may also share certain Non-Identifying Information with these parties, including Hashed Information, in connection with the services they provide to us (except we will never share a cell phone number with anyone). If you wish to opt out of interest-based advertising from participating companies, click [here](#). You must opt out on each device and each browser where you want your choice to apply. If you choose to opt out, please note you will continue to receive advertisements, but they may be less relevant to you.

While we may use a variety of service providers to perform advertising services, some of these companies are members of the Network Advertising Initiative (“**NAI**”) or the Digital Advertising Alliance (“**DAA**”) Self-Regulatory Program for Online Behavioral Advertising. You may want to visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp), which provides information regarding targeted advertising and the “opt-out” procedures of NAI members. You may also want to visit <http://www.aboutads.info/choices/>, which provides information regarding targeted advertising and offers an “opt-out” by participating companies in the DAA Self-Regulatory Program.

### 1.5. Do Not Track Signals and GPC

Please note that your browser setting may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. Credzu does not generally alter its practices when it receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Global Privacy Control (GPC) is a technical specification that you can use to inform websites of your privacy

preferences regarding ad trackers. If you do choose to set up GPC, it may impact the functionality of the Site, but we honor the GPC signal on a per-browser basis automatically in your cookie preferences.

## 1.6. Children

The Service is general audience and intended for users 18 and older. We do not knowingly collect Personal Information from anyone younger than age 18. If we become aware that a child younger than 18 has provided us with Personal Information, we will use commercially reasonable efforts to delete such information from our files. If you are the parent or legal guardian of a child younger than age 18 and believe that Credzu has collected Personal Information from your child, please contact us at: [info@credzu.com](mailto:info@credzu.com)

# 2. USE OF INFORMATION

## 2.1. We Use Information We Collect:

- To provide and improve the Service, complete your transactions, address your inquiries, process your registration, verify the information you provide is valid, and for compliance and internal business purposes.
- To contact you with administrative communications and Credzu newsletters, marketing or promotional materials (on behalf of Credzu or third parties) and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please email [info@credzu.com](mailto:info@credzu.com)
- To tailor the content we display and offers we may present to you, both on the Service and elsewhere online.
- To administer and develop our business relationship with you and, if applicable, the corporation or other legal entity you represent.
- To prepare related governmental and internal statistics reports.
- We may also use device identifiers to identify Credzu users and enforce and comply with the law, including to conduct an investigation, protect the property and rights of Credzu or a third party, protect the safety of the public or any person, or prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical, or legally actionable.
- For the purposes disclosed at the time you provide your information, with your consent, and as further described in this Privacy Policy.
- To honor our contractual commitments to you. Much of our processing of Personal Information is to meet our contractual obligations to our investors, or to take steps at Users' request in anticipation of entering into a contract with them.
- For our legitimate interests. In many cases, we handle Personal Information on the grounds that it furthers our legitimate interests in commercial activities, such as the following, in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:
  - Providing our Site and Service.
  - Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
  - Measuring interest and engagement in our Services.
  - Short-term, transient use, such as contextual customization of ads.
  - Improving, upgrading or enhancing our Services.
  - Developing new products and services.
  - Ensuring internal quality control and safety.
  - Authenticating and verifying individual identities.
  - Debugging to identify and repair errors with our Services.
  - Auditing relating to interactions, transactions and other compliance activities.
  - Enforcing our agreements and policies, including escrow agreements.
  - Analyzing and improving our business.
  - Communications, including marketing and responding to your inquiries about our services.
  - Addressing information security needs and protecting our Users, Credzu, and others.
  - Managing legal issues.
- To comply with legal obligations. We need to use and disclose Personal Information in certain ways to comply with our legal obligations.

### 3. DATA RETENTION

Unless you request that we delete certain information, we will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including satisfying any legal, regulatory, accounting, or reporting requirements, as well as ongoing fraud prevention, backup, and business continuity purposes.

### 4. INFORMATION SHARING AND DISCLOSURE

#### 4.1 Cell Phone Number Privacy

We hold the privacy of our users in the highest regard, understanding the importance of protecting your personal information. This is especially true for cell phone numbers.

##### 4.1.1 Non-Disclosure of Cell Phone Information

**WE HEREBY AFFIRM THAT WE DO NOT SELL, LEASE, SHARE, OR OTHERWISE DISCLOSE YOUR CELL PHONE INFORMATION TO THIRD PARTIES. THIS POLICY IS NOT ONLY A REFLECTION OF OUR COMMITMENT TO YOUR PRIVACY BUT ALSO A COMPLIANCE MEASURE WITH THE REGULATIONS GOVERNING A2P 10DLC MESSAGING SERVICES.**

##### 4.1.2 A2P 10DLC Compliance

Application-to-Person (A2P) 10DLC refers to using a standard 10-digit long code phone number for sending business messages. The regulatory environment surrounding A2P 10DLC messaging is designed to safeguard consumer interests, ensuring that messages are sent responsibly. Adhering to these restrictions, Credzu employs A2P 10DLC practices solely for legitimate business communications and under strict compliance with applicable laws and regulations.

In light of these A2P 10DLC restrictions, we assure you that your cell phone information will be used exclusively for the purposes for which you have provided consent. Our use of A2P 10DLC technology is geared towards enhancing your experience with our services without compromising your privacy or the security of your personal information.

##### 4.1.3 Commitment to Transparency and Security

We are committed to maintaining the highest standards of privacy and security regarding your personal information. We employ robust security measures to protect against unauthorized access to or misuse of your cell phone information. Additionally, we are transparent about our data practices and welcome any inquiries or concerns regarding the use of your personal information.

#### 4.2 Sharing of information other than cell phone numbers.

**We do not sell your Personal Information for monetary consideration**, and we do not share your Personal Information with third parties for those third parties' marketing purposes. However, we may use technologies on our Site for the purposes of advertising or marketing to you and understanding how you interact with our ads. We may share information we have collected about you (except we will never share your cell phone number with anyone) for the following business or commercial purposes:

##### Credzu Users

We may share the following information between Credit Service Sellers and Credit Service Sellers who have entered into a Credit Service Contract: First Name, Last Name, Company Name, Email, Address, credit report information and scores, and Website. Note that if a Credit Service Seller is suspended, this provision is not suspended, and sharing will continue as necessary for

## **Service Providers**

business or commercial purposes.

We may employ service providers and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of Credzu's features) or to assist us in analyzing how our Service is used. These Service providers may include analytics companies, advertising partners, payment processors, identity verification companies, security companies, generative AI partners, or other merchants. These third parties may have access to your Personal Information in order to perform these tasks on our behalf.

## **Legal and Investigative Purposes**

Credzu will share information with government agencies as required by law including (without limitation) in response to lawful requests by public authorities to meet national security or law enforcement requirements and in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), or, at the request of governmental authorities or other third parties conducting an investigation where we determine in our sole discretion the disclosure is necessary to (a) protect the property and rights of Credzu or a third party, (b) protect the safety of the public or any person, or (c) prevent or stop activity we may consider to be, or pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.

## **Internal and Business Transfers**

Credzu may share information, including Personal Information, with any current or future subsidiaries or affiliates, primarily for business and operational purposes, including activities such as IT management, for them to provide services to you, or support and supplement the Services we provide. We may sell, transfer, or otherwise share some or all of our assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.

## **Non-Identifying Information and De-Identified Information**

We may share aggregated Non-Identifying Information and we may otherwise disclose Non-Identifying Information (including, without limitation, Hashed Information) or De-Identified Information to third parties.

# **5. YOUR CHOICES AND RIGHTS**

You may have certain choices and rights associated with your personal information, including opting out of targeted advertising or other disclosures to third parties. Residents of certain locations may have the right to have an authorized agent submit requests on your behalf. You or your authorized agent may request that Credzu honor these rights by emailing [info@credzu.com](mailto:info@credzu.com).

**Non-Discrimination:** You will not receive any discriminatory treatment by us for the exercise of your privacy rights.

**Verifying Your Request:** Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

## 5.1 Notice for California Residents

**“Shine the Light” and “Eraser” Laws:** Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

**California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA):** The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and processing of their personal information.

*Your Right to Know:* California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or “selling” your personal information as defined by the CCPA.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

*Your Right to Opt-Out of “Sale” or “Sharing” of Personal Information:* California residents have the right to opt-out of the “sale” or “sharing” of their personal information as defined by the CCPA by emailing [info@credzu.com](mailto:info@credzu.com).

Please note that we do not knowingly “sell” the personal information of any individuals under the age of 18.

Where we are “sharing” your personal information with third parties for the purposes of cross-context behavioral advertising or profiling, you may opt-out of such sharing at any time by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

*Your Right to Limit Use of Sensitive Personal Information:* California residents may have the right to request that businesses limit the use of any sensitive personal information to those uses which are necessary to perform the Services or for other specifically-enumerated business purposes under the CCPA, as amended by the CPRA. Please note that we do not use sensitive personal information other than as necessary to perform the Services or as specifically permitted under the CCPA.

*Your Right to Delete:* California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our service providers to delete your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to

retain such personal information under one or more of the exceptions listed in the CCPA.

*Your Right to Correct:* Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

*Non-Discrimination:* You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

### **5.3 Notice for Nevada Residents**

Under Nevada law, certain Nevada residents may opt out of the sale of “personally identifiable information” for monetary consideration to a person for that person to license or sell such information to additional persons. “Personally identifiable information” includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by emailing [info@credzu.com](mailto:info@credzu.com). Please note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

### **5.4 Notice for Residents of Certain Other States**

The laws of your state of residence (“Applicable State Law”) may provide you with certain rights, including the following:

*Your Right to Confirm and Access:* You have the right to confirm whether we are processing personal information about you and access the personal information we process about you.

*Your Right to Portability:* You have the right to obtain a copy of the personal information we maintain and process about you in a portable and, to the extent technically feasible, readily-usable format.

*Your Right to Delete:* You have the right to request that we delete the personal information we maintain or process about you.

*Your Right to Correct:* You have the right to request that we correct inaccuracies in the personal information we maintain or process about you, taking into consideration the nature and purpose of such processing.

*Your Rights to Opt-Out:* You have the right to opt-out of certain types of processing of personal information, including:

- Opt-Out of the “sale” of personal information as defined by Applicable State Law;
- Opt-Out of targeted advertising by us;
- Opt-Out of automated profiling for the purposes of making decisions that produce legal or similarly significant effects.

Please note, as explained above, we do not “sell” personal information as that word is traditionally defined. However, we do share personal information with third parties to provide you with personalized advertising from us and to better understand how you interact with our Services. Through the use of cookies, we may also make available certain personal information to third parties for targeted advertising. You may opt-out from any of these disclosures under Applicable State Law by emailing [info@credzu.com](mailto:info@credzu.com).

### **5.5 Appeals Process & Other Concerns**



Certain information may be exempt from the rights described above under applicable law. If we deny your request in whole or in part, you may have the right to appeal the decision. In such circumstances, we will provide you with information regarding the appeals process. Depending on your location, you may also email [info@credzu.com](mailto:info@credzu.com) with the subject “Data Privacy Request Appeal” to provide us with details about why you are appealing the decision.

If you have an unresolved privacy or data use concern that we have not addressed to your satisfaction, please contact our U.S.-based third-party dispute resolution provider free at <https://feedback-form.truste.com/watchdog/request>.

## **6. SECURITY**

Credzu takes reasonable steps to help protect and secure the information it collects and stores about Credzu Users. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use.

## **7. CROSS-BORDER DATA TRANSFERS**

Credzu does not store or transfer information to any data centers or servers outside the United States.

## **8. LINKS TO OTHER SITES**

Our Service contains links to other websites. If you click on a third-party link, you will be directed to that third party’s website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We encourage you to read the privacy policies or statements of the other websites you visit.

## **9. CHANGES TO THIS POLICY**

This Privacy Policy is effective as of the date stated at the top of this page. Credzu may update this Privacy Policy at any time and any changes will be effective upon posting. By accessing or using the Service after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

## **10. CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [info@credzu.com](mailto:info@credzu.com), or by mail addressed to Credzu, Attn: Legal, 1980 N. Atlantic Ave., Second Floor, Cocoa Beach, FL 32931.