

## ONLINE PRIVACY POLICY

Last Revised: November 1, 2021

- 1. Introduction and Scope of Online Privacy Policy.** This (“Online Privacy Policy”) describes how Microf LLC, its affiliates and subsidiaries (collectively “Microf”, “we”, “our”, or “us”), collects, uses and shares your information at our websites, [www.microf.com](http://www.microf.com) and [www.spectrumac.com](http://www.spectrumac.com) (our “Websites”). We take the privacy of our customers and visitors to our Websites very seriously.

This Online Privacy Policy applies to information collected through our Websites (defined in Section 2 below) but does not apply to information, including Personal Information, collected from third-party sources (such as consumer reporting agencies) or that you reveal or post in any public forum on our Websites, websites that link to or from our Websites, or any other websites.

- 2. Important Information Regarding Use of our Websites.** Microf owns the information we collect on the Websites.

This Websites are intended for visitors located in the United States. This Websites are governed solely by the federal and state laws in the United States. Users from the European Union are advised not to disclose any Personally Identifiable Information to us. Information submitted to the Websites is housed on servers located in the United States. You agree not to attempt to log on to the Websites from any country under sanctions by the Office of Foreign Asset Control (“OFAC”). Which countries are under sanctions may be found on the United States Department of the Treasury website. Any attempt to log on to the Websites from such a country may result in your access being restricted or terminated. Your use of the Websites may be monitored, tracked and recorded.

**By using the Websites, you agree to the terms of this Online Privacy Policy. If you do not agree to the terms of this Online Privacy Policy, do not use the Websites.** Furthermore, by using the Websites, you agree to the application of United States law and consent to the use and disclosure of your information consistent with this Online Privacy Policy.

- 3. What information do we collect?** Microf collects Personal Information and Non-Personally Identifiable Information (“NPI”).

**Personal Information** is any information that directly identifies an individual, such as an individual’s name, street or postal address, e-mail address, geolocation, financial and banking information (including bank account information and payment card data), social security number, government issued identification number, telephone number, or date of birth. Personal Information may also include details about devices used to access our Websites such as IP address, browser information, device information, and operating system information. We may also collect information about the use of websites, social media presence, and internet-enabled services and platforms by automated means, such as cookies, web beacons, HTML5 localStorage, and other technologies.

**Non-Personally Identifiable Information** or NPI is any information about an individual or about categories of individuals that does not identify you individually. This may include your gender, occupation and other employment information, income and benefits information, residence-related information such as lease and ownership information, payment history with us, and other information.

- 4. How do we collect your information?** We may collect Personal Information from you in a variety of ways, such as when you seek to lease our products and when you apply for a lease or a lease amount at dealer.microf.com. We may also collect Personal Information from or about you when you visit a website owned or operated by Microf or on our behalf when you enroll in automatic payments, visit social media websites, or when you enter a promotion we offer. On occasion, we use third parties to provide us with Personal Information about you. For example, if we know your name and postal address, we may use a third-party to provide us with your email address. In addition to what is described below, we use this information for market analysis, marketing and other business purposes, including enforcement of contractual obligations. We may also collect Personal Information about you from consumer and/or

credit reporting agencies or individuals we believe may be associated with you, among others. In addition to what is described below, we collect NPI through many sources, including from information that you and third parties provide to us.

**Online Activities.** When you visit our Websites, we may collect information about your visit and store that information, which are records of the activities on our Websites. Our servers automatically capture and save the information electronically. The information we collect helps us administer the Websites, analyze usage, protect the Websites and their content from inappropriate use, and improve the visitor's experience. The information may be used for marketing purposes and may uniquely distinguish your browser or computer from others' devices. Examples of information that we may collect or that third parties may collect while you navigate our website include, but are not limited to:

- Your Internet protocol or "IP" address;
- The name of your Internet service provider;
- The city and state from which you access our website;
- The type and version of browser, operating system, computer, or mobile device you use;
- Screen resolution;
- A list of your browser's plug-ins;
- Installed fonts;
- Other technical characteristics of your browser, computer, or device;
- The links you click within our Websites and the pages you visit;
- The date and time of your visit;
- The web page from which you arrived to our Websites; and
- Certain searches/queries that you conducted via our Websites.

**Cookies.** A cookie is a small data string that a web server stores on your computer or mobile device . (A web server is the computer that hosts a website and responds to requests received from your computer.) We may use cookies to store and help track information about you in order to offer and provide a good customer experience using on our Websites. Among other things, cookies enable a website to maintain continuity when a visitor's web browser requests a series of webpages. For example, without cookies, a website owner may not be able to recognize that a visitor just completed the first step during an online ordering process so that the second step can be presented.

Cookies also enable advertising, allowing web servers involved in advertising operations to recognize your browser as you navigate to other websites. Cookies are necessary for the online delivery or placement of our ads. For example, we use cookies in connection with Google Ads so that Google can show ads for our products to you before or after you visit our Websites. Google's Adwords technology may recognize a cookie that our Websites have sent to your browser during a past visit and use the cookie information to show you ads for our products or similar products.

Most browsers are initially set up to accept browser cookies; however, you can manage browser cookies by using features and functions available on most Internet browsers. For example, most browsers will allow you to choose what cookies can be placed on your computer and to delete or disable cookies. You should understand that some features of many websites may not function properly if you block or don't accept cookies.

**Other Data Collection Technologies.** Web beacons, pixel tags, .gif files, and the like, allow for the collection of information about your interactions on our Websites. These technologies may be used to place advertisements, understand website traffic patters and the number of visitors to our Websites, and to measure the effectiveness of advertisements or our Websites. Web beacons

**Social Networks and Widgets.** Our Websites also include social network or other third-party plug-ins and widgets that may provide information to their associated social networks or third-parties about our Websites you visit, even if you do not click on or otherwise interact with the plug-in or widget and regardless of whether you have an account or other relationship with these social networks and third parties. Information is transmitted from your browser and may include an identifier assigned by the social

network or third-party, information about your browser type, operating system, device type, IP address and the URL of the web page where the plug-in or widget appears. If you use social network tools or visit social networking websites, you should read their privacy policies, to learn what information they collect, use, and share.

**Links to Other Websites.** Microf may establish on our Websites links and pointers to websites that are operated and maintained by third parties (each, a “Third Party Site”). These links are provided solely as pointers to information on topics that may be useful to you. However, the establishment of any link to a Third-Party Site is not a recommendation or endorsement by Microf of any products, services, information, goods, ideas or opinions that may be found on any Third-Party Site.

Microf makes no warranties, either express or implied, concerning the content of any Third-Party Site, including the accuracy, completeness, reliability or suitability thereof for any particular purpose. Microf does not warrant that any Third-Party Site is free from any claims of copyright, trademark or other infringement. Microf does not warrant that any Third-Party Site is free from any viruses or other contamination.

You understand that Third-Party Sites may have a privacy policy that is different from that of Microf and that Third-Party Sites may provide less security than this Site. The choice to access a Third-Party Site, or to purchase or otherwise use any of the products or services advertised or provided on a Third-Party Site is yours, in your sole discretion.

5. **How Do We Use and Share Your Information?** We use the Personal Information and NPI we collect from you for many purposes, including, but not limited to:

- Processing, managing, completing and accounting for transactions, including fulfilling product and service arrangements and collecting amounts payable associated with such arrangements;
- Providing products and services you request;
- Enforcing contractual obligations;
- Helping to prevent fraud, unauthorized or criminal activity, claims and other liabilities;
- Operating, evaluating and improving our business, including developing new products and services, managing our communications, performing research and administering our website and other programs, and for auditing purposes;
- Determining your eligibility for future products and services or when determining your approved lease amount;
- Marketing and advertising to you our products and services through email, online outreach, and other channels;
- Communicating with you about our products and services, including to respond to your comments and inquiries, provide customer service, and to identify your preferences so we can notify you of new or additional products, services, or promotions that may be of interest to you;
- Enabling you to participate in surveys and other research efforts;
- Performing data analysis, including market and consumer research, financial analysis, and to measure the effectiveness of our advertising efforts online and otherwise; and
- Complying with applicable legal and regulatory requirements, industry standards or guidelines, and Microf’s policies.

In addition to other sharing described in this section, we may disclose Personal Information and NPI: (a) in order to comply with laws or legal process, including subpoenas or agency orders and investigations which we determine are required under appropriate circumstances; (b) as we reasonably determine necessary or appropriate to protect property, our rights or the rights of others; and (c) to enforce our contracts, policies and customer agreements. We may also de-identify Personal Information that we receive from you or from third-parties so that it cannot be used to identify a specific individual and we

may transfer or provide a copy of information covered by this Online Privacy Policy, including Personal Information, in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) of all or part of Microf's business or as part of a change in control.

We do not sell Personal Information for any commercial or marketing purposes, have not sold Personal Information in the preceding 12 months and do not intend to sell Personal Information.

**Sharing With Corporate Entities and Third Parties.** We may share Personal Information and NPI with our affiliates, subsidiaries, and service providers who provide services to us on or on our behalf and agree to only use as much information for the purpose for which it was provided and in accordance with this Online Privacy Policy. We may also provide Personal Information and NPI to credit bureaus, third parties collecting amounts owed to us, and third parties to whom we assign your account for collection purposes.

We may share the Personal Information with select third-party vendors, business partners, and other companies so that they can send you promotional materials about goods and services (including special offers and promotions) offered by them. After the information is provided to such third parties, the subsequent use or disclosure of such information is subject to those third-parties' privacy policies and practices.

We may use services hosted by third parties to assist in providing our services and to help us understand our customers' use of our products. A third-party service may collect information sent by your browser as part of a web page request, including, for example, your IP address, the third-party's cookies, or any of the other categories of information itemized under Online Activities, above.

Microf may use "interest-based" ads also known as "online behavioral advertising" or "OBA". Online behavioral advertising is advertising that is directed to you based, at least in part, on your internet browsing behavior across the web. Although we do not share Personal Information with third parties that conduct advertising operations on our behalf, these third parties and their affiliates do collect certain information as a result of their "tags" being on our website. The information they collect includes the name (URL) of the web pages you view while on our site, your IP address, time of visit, information about your browser software, information about your device, and randomly assigned identifiers stored and/or transmitted using cookies or similar technologies, which they use to target and serve advertising.

6. **How Do We Protect Your Information?** We maintain administrative, technical, and physical safeguards intended to protect against the loss, misuse, alteration, and unauthorized access or disclosure of Personal Information and NPI, but we make no assurances about the safety and security of Personal Information or NPI.

7. **Retention and Disposal of Personal Data.** We will keep Personal Information about you for as long as it is necessary to fulfill the purposes for which we process it, or if we have another lawful basis for retaining the data beyond the period for which it is necessary to serve the original purpose for collecting the data. This may mean that we will retain some information about you for longer than other information. The criteria we use to determine data retention periods for personal data includes the following:

- Retention in case of queries; we will retain it for a reasonable period after the relationship between us has ceased;
- Retention in case of claims; we will retain it for the period in which it may be enforced; and
- Retention in accordance with legal and regulatory requirements; we will consider whether we need to retain any additional period because of a legal or regulatory requirement.

Personal Information is deleted and erased from Microf's servers and backups per business processes, as required by law, and upon consumer request.

8. **Will this Policy Change?** This Online Privacy Policy may be updated periodically to reflect relevant changes in our information practices. We will post a notice on our Websites to inform you of significant

changes to this Policy. We will also provide additional information regarding changes to this Online Privacy Policy as may be required by law. Your continued use of our Websites following our posting of any such changes will mean that you accept such changes.

#### 9. Your Options Regarding Personal Information.

You may request that we correct, update or amend your Personal information we collect and maintain. To update us regarding changes in your Personal Information, please contact us as described below.

You may elect to opt-out of receipt of email and text communications from us by following the instructions provided in such communications or by contacting us as provided below. Even after opting out, you may still receive service oriented, non-promotional communications from us and promotional communications from other third parties as a result of their own interactions or transactions with you. Please allow time for us to process your request or contact us should you have any concerns about your opt-out request.

“Do-Not-Track” is a public-private initiative that has developed a technical “flag” or signal that an end-user may be able to activate within their browser software to notify websites that they do not wish to be “tracked” by third parties as defined by the initiative. The initiative, however, has not reached a consensus as to exactly what technical or other actions those parties receiving the signal should take. As a result, Do-Not-Track has not yet been standardized and most websites, including Microf’s, do not alter their behavior or change their services when they receive a “Do-Not-Track” flag or signal.

You can make decisions about your privacy and the ads you receive. As explained in Section 4 above, most browsers will allow you to choose what cookies can be placed on your computer and to delete or disable cookies. Please note that if you decide to block cookies, some parts of our website may not function correctly.

#### 10. California Residents’ Options Regarding Personal Information.

**Your California Privacy Rights.** California residents have certain rights with respect to their Personal Information, as described below. We are required by law to verify your identity in connection with any request in order to prevent unauthorized access of your data. Microf will utilize consumer provided personal and agreement related information to verify the identity of said consumer against known Microf customer information. This may require us to verify your identity by means of collecting personal information to compare with the information we have on file. This data will be used solely for validation purposes and will not be stored separately. Please note that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). We will try to comply with your request as soon as reasonably practicable. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law. Where required by applicable law, we will notify you if we reject your request and notify you of the reasons we are unable to honor your request.

- **Right to Know and Access Information.** You may access **Personal Information** we maintain about you using the methods provided below. If we grant your request, we will provide you with a copy of the Personal Information we maintain about you in the ordinary course of business. This may include what Personal information we collect, use, or disclose about you. We may not fulfill some or all of your request to access as permitted by applicable law.
- **Deletion of Personal Information.** You may request that we delete your **Personal Information**. Depending on the scope of your request, we may refrain from granting your request, as permitted by applicable law, for we may be legally required to retain your information in our business records. You may submit a deletion request using the methods provided below.
- **“Do Not Sell”.** We did not sell your Personal Information, including as defined by California law.
- **Non-Discrimination.** We will not discriminate against you, in terms of price or services that we offer, if you submit one of the requests listed above.



**Authorized Agent.** California residents may use an authorized agent on their behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a California resident to communicate with us or exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the resident and have sufficient access to their laptop, desktop, or mobile device to exercise these rights digitally. If you are an authorized agent trying to exercise rights on behalf of a Microf user, please contact us at the contact information below with supporting verification information, which includes a valid Power of Attorney in the State of California, proof that you have access to the consumer's interface, and proof of your own identity.

**To Exercise Rights.** Should you have any questions or concerns regarding your California rights or this privacy policy, or to exercise the rights described above, please email us at [riskops@microf.com](mailto:riskops@microf.com) or contact us using the information below.

Microf LLC  
Attn: Legal Department  
1000 Holcomb Woods Parkway  
Building 400, Suite 417  
Roswell, GA 30076  
1-855-642-7631

**Additional California Privacy Rights.** California residents may ask us to refrain from sharing Personal Information with third-parties for their own direct marketing purposes. Please contact us as described above to indicate your preference. Please also note it may take us up to thirty (30) days to fully process your request.

11. **Children's Online Privacy Policy.** Our Websites are not directed to children under the age of 18, and we do not knowingly collect Personal Information from children under the age of 18 on these Websites. In addition, Microf does not sell any Personal Information of minors under 18 years of age.
12. **Your Right to Lodge A Complaint with A Supervisory Authority.** Without prejudice to any other administrative or judicial remedy you might have, you may have the right under data protection legislation to lodge a complaint with the relevant federal and/or state data protection supervisory authority if you believe that we have infringed on applicable data protection legislation when processing Personal Information about you.
13. **Contact Us.** For further information or if you have any questions or queries about this Online Privacy Policy, please email us at [riskops@microf.com](mailto:riskops@microf.com) or call us toll free at 855-642-7631 Monday through Friday from 8am until 7pm Eastern or Saturday from 10am through 2pm Eastern.