

Lomsy Privacy Policy

Thank you for visiting this website, which is owned and operated by Fraternitas LLC, dba Lomsy (“Lomsy” or “us”). By accessing and using the site and/or utilizing Lomsy products or services, you accept and agree to the following privacy policy (“Privacy Policy”)

Last Updated: July 28th, 2021

Introduction

Lomsy is a financial services company that respects your privacy and we are committed to protect your information that may be collected when you use our website or when applying for or receiving any product or service from us (“Services”).

This Internet Privacy Policy describes our practices regarding information that may be collected during visits to all websites or maintained by Lomsy or when using Lomsy Services.

By using our Site or Services, you agree to our collection, use, and sharing of your information as described in this policy.

1. COLLECTED INFORMATION

We and our services providers collect identifiers, location information, commercial information, electronic network activity information, professional information, inferences, and other types of personally identifiable information (“PII”) that you provide when using our Services, including but not limited to contact information such as name, email address, phone number, username, among other information used to contact you. We may request additional PII that is necessary to process any application submitted by you and additional PII to verify your identity, for security-related purposes or other administrative purposes. This information may be supplemented by third-party sources, such as a consumer report information.

We also collect information about your use of our Services regarding account and transaction information, such as payment information (including debit card, ACH payment information, and any other method of payment), and bank account information, as well as tokens from online services and payment systems.

If your financial accounts are connected with an application, either through a Lomsy application or third-party application, that analyzes and reports your financial accounts we may, if required by the provider of your account, collect identifier and login information, such as your username and password, or a security token. When providing this information, you give Lomsy and/or the third-party application authority to act on your behalf to access and transmit your data from the relevant bank or other entity that provides your financial accounts. We may also collect account information, including financial institution name, account name, account type, account ownership, branch number, IBAN, BIC, account number, routing number, sort code, information about an account balance, including current and available balance, information about credit accounts, including due dates, balances owed, payment amounts and dates, transaction history,

credit limit, repayment status, interest rate, information about loan accounts, including due dates, repayment status, balances, payment amounts and dates, interest rate, guarantor, loan type, payment plan, and terms, information about investment accounts, including transaction information, type of asset, identifying details about the asset, quantity, price, fees, and cost basis. We may also collect information about account transactions, including amount, date, payee, type, quantity, price, location, involved securities, and a description of the transaction. Lomsy also can collect information about you from other sources. This can include identifiers and commercial information about you directly from the relevant developer or other third parties, including our service providers, bank partners, and identity verification services.

2. USE AND SHARING OF INFORMATION

- a. The information collected is used for a number of business purposes, including the following purposes:
 - i. To provide our Services, including but not limited to, consider loan applications, make loans, process payments, enforcing contracts with you, connect third-party applications and services, connect your financial institution, and develop new Services.
 - ii. To protect the rights privacy, safety, or property of customers, developers, partners, and affiliates from fraud, malicious activity, and other privacy and security-related concerns.
 - iii. To communicate with you: We use PII to communicate with you about our Site and Services. This may include payment reminders, information that you have requested, or notification of important changes to our Site and Services. We may also use your PII to provide you support on current services you may have or other services you may have ordered.
 - iv. For marketing purposes: We may send you information about products and services that we believe will be of interest to you. During any automated communication, an option to “opt out” of the communication will be available.
 - v. For specific purposes: You may be asked to provide information for a specific purpose or programs. We will only use the information that you provide for the purpose for which you provided it to us.
 - vi. For site maintenance: We analyze the interactions between our users and our Site to maintain and improve our Site and Services, as well as to diagnose any problems with our Site or Services to improve the user experience.
 - vii. For testimonial purposes: If you choose to consent and tell us your story, we may post such testimonial on our Site, any Lomsy social media

channels or platforms, in print, or in any other advertising material along with your name and any other PII that you choose to disclose. You may revoke such consent at any time by emailing Lomsy at hello@lomsy.com.

- b. We reserve the right to share information with third parties, as described below:
 - i. To service providers: We may share information with third-party service providers that help us perform functions of our Service and process your transactions.
 - ii. To prevent illegal activities: We may share information with third-parties if we believe it is necessary to detect, investigate, prevent, or act against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
 - iii. If required by law: We will share information whenever we are legally required to do so, such as in response to court orders or legal process, to establish, protect, or exercise our legal rights, to defend against legal claims or demands, or to comply with requirements of mandatory applicable law.
 - iv. Affiliates and other companies: We may share information with a parent or shareholder company, subsidiaries or other companies under common control with Lomsy. We may share information with other companies for purposes of marketing our products to you or for analyzing our business and transactions.
 - v. Corporate Structure: We may share information in connection with a merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets or if we undergo bankruptcy or liquidation.
 - vi. Aggregate Information: We may share information in an aggregated, deidentified, or anonymized manner, which does not identify you personally, for any purpose permitted under applicable law. This includes but is not limited to creating or using aggregated, de-identified, or anonymized data based on the collected information to develop new services and to facilitate research. This aggregate information may be shared with third-parties not otherwise included in this Privacy Policy.

3. INFORMATION ABOUT CHILDREN

Our Services are only available to individuals age 18 and older. We do not knowingly collect, maintain, or use personal information from our Site or Services about children under the age 18. Persons under the age of 18 should not use our Site. If we become aware that a child under 18

has opened an account or provided us with PII, we take steps to permanently erase or delete said account and PII.

4. SECURITY

We use reasonable physical, electronic, and procedural safeguards to protect and limit access to all PII and data. These measures include computer safeguards, secured files, and secured offices. We only authorize our employees to access your information for work-related purposes, and we require all third-party service providers we work with to protect your information with similar or policies.

Please note that information you send to us electronically may not be secure when you transmit the information to us through third parties. We recommend that you do not use unsecure channels to communicate any PII to us. We are not responsible for any breach or loss that occurs when PII or data is transmitted to us electronically to us through third parties.

We retain all PII until the information no longer fulfill the purpose for which it was collected and used, as described in this Privacy Policy. Even after you stop using Lomsy Services, we may still retain your information, however your information will only be processed as required by law or in accordance with this Privacy Policy.

5. ACCURATE INFORMATION

Keeping your account information accurate and up to date is very important. If you ever have questions or issues with the accuracy of your personally identifiable information, please contact us at hello@lomsy.com, or at (281)-501-0645. We will promptly investigate your concerns and update our records if needed.

We request that you keep your information as up to date as possible so that you may take full advantage of our Services. Please make sure that you inform us of any changes to your e-mail address, phone number, or mailing address.

6. THIRD-PARTY WEBSITES

At our discretion, we may include or offer links to third party Internet websites, banner ads or advertisements for the convenience of users in locating information, products and services that may be of interest. If you use those linked Internet websites or advertisements, you may leave this Site and go to websites that we do not control. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

This Internet Privacy Policy is for customers and visitors, it only applies to our Site(s) and not to any linked site or any site provided by a third party.

7. UPDATES

We may change this Internet Privacy Policy from time to time. When we do, we will let you know by posting the revised version on this page with an updated date. Any changes to this Internet Privacy Policy will become effective when posted unless otherwise indicated.

8. CONTACT

You may contact us by email at hello@lomsy.com or by mail at Fraternitas LLC dba Lomsy, 4299 San Felipe Street Suite 135, 77027 Houston, Texas.

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