

# Salt Point Finance dba Pave Credit Privacy Policy

*Last Updated: August 11, 2021*

Salt Point Finance dba Pave Credit ("**we**," "**us**," or "**our**") respects your privacy and knows that you care about protecting your personal information. This privacy policy identifies what information we collect from you when you use [www.Pavecredit.com](http://www.Pavecredit.com) (the "**Site**," including all subdomains) and the services made available on it (the "**Services**") and explains how we may use or share that information. We will only use and share your information as described in this privacy policy.

This Site primarily operates as a(n) for-profit business website. This privacy policy applies to information we collect from you on the Site; through the Services; in email, text, and other electronic correspondence; and through any mobile or desktop application through which we may communicate. This privacy policy does not apply to information we collect offline or that any third party collects from you after you follow links on the Site, including any advertising and affiliate links.

PLEASE READ THIS PRIVACY POLICY AND OUR TERMS OF USE CAREFULLY. THE TERMS STATED IN THIS PRIVACY POLICY CONSTITUTE A BINDING LEGAL AGREEMENT BETWEEN YOU AND PAVE CREDIT LLC. BY USING THIS SITE AND THE RELATED SERVICES, YOU UNCONDITIONALLY AGREE TO BE BOUND BY THE TERMS STATED IN THIS PRIVACY POLICY AND OUR TERMS OF USE, INCLUDING ALL EXCLUSIONS AND LIMITATIONS OF LIABILITY, AND WARRANT THAT YOU HAVE FULL AUTHORITY AND CAPACITY, LEGAL AND OTHERWISE, TO USE THE SERVICES. YOU MAY NOT ACCESS OR USE THIS SITE OR THE SERVICES IF YOU DO NOT AGREE TO ANY PART OF THESE TERMS. WE RESERVE THE RIGHT TO PERIODICALLY MAKE UPDATES TO THIS PRIVACY POLICY AS OUR PRACTICES CHANGE. YOUR CONTINUED USE OF THE SITE AFTER SUCH CHANGES CONSTITUTES YOUR ACCEPTANCE OF THE CHANGES, SO PLEASE CHECK BACK PERIODICALLY FOR UPDATES.

## **1. Information We Collect**

We may collect and use the following types of information from those who use the Site and the Services:

- Information by which you may be personally identified, such as your name, address, email address, phone number, social security number, billing information, banking history, and credit card information, and other information that may not be publicly available ("**personal information**").
- Information about you that does not identify you personally, including, but not limited to, your demographic information (for example, your age, gender, race, religion, political affiliation, and household income), personal interests, online interactions, viewing data, requests for Services, communications with us and third parties, advertisement interactions, survey and polling information, Site feedback or suggestions, search queries, and any other activities when using the Site or the Services.
- Information you provide when you register with the Site and the Services, when adding or updating account preferences, and when subscribing for any Services not limited to income information, employment information, payment history, credit history, account balances, and bank account information.
- Information about your transactions using the Site and the Services, including, but not limited to, your purchases and order history.

We may combine information you provide us with other information about you that we obtain from your past use of the Site and Services, from our business partners, and from other companies. We will treat any non-personal information that is combined with personal information as if it were all personal information.

## FACTS

### WHAT DOES SALT POINT FINANCE DBA PAVE CREDIT DO WITH YOUR PERSONAL INFORMATION?

#### WHY?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### WHAT?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Credit history and Credit Scores
- Payment History and Employment Information
- Account Balances and Checking Account Information

#### HOW?

All financial companies need to share consumers' information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers' personal information; the reasons Salt Point Finance dba Pave Credit chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information.	Does Salt Point Finance dba Pave Credit Share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	N/A
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	Yes	Yes

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>• Call our toll-free number: <b>855-801-7283</b></li> <li>• Visit us on the web at: <a href="http://www.pavecredit.com">www.pavecredit.com</a></li> <li>• Email <a href="mailto:support@PaveCredit.com">support@PaveCredit.com</a></li> <li>• Please Note: If you are a new customer, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</li> </ul>
<b>Questions?</b>	Call: <b>855-801-7283</b> , email Us at <a href="mailto:support@pavecredit.com">support@pavecredit.com</a> or visit <a href="http://www.pavecredit.com">www.pavecredit.com</a>

Who we are:	
Who is providing this notice?	Salt Point Finance dba Pave Credit, a wholly-owned and operated subsidiary of Kashia Services, a wholly-owned and operated economic arm, instrumentality of the Kashia Band of Pomo Indians, is providing this privacy policy.

What we do	
How does Salt Point Finance dba Pave Credit protect my personal information?	<ul style="list-style-type: none"> <li>• To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</li> <li>• We also maintain physical, electronic and procedural safeguards (e.e., computer virus protection software, firewalls, 128-bit Secure Socket Layer). Only authorized employees have access to your personal information.</li> </ul>
How does Salt Point Finance dba Pave Credit collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>• Apply for credit</li> <li>• Give us your income information</li> <li>• Provide employment information</li> <li>• Provide account information</li> <li>• Give us your contact information</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business</li> <li>• Affiliates from using your information to market to you; and</li> <li>• Sharing for non-affiliates to market to you.</li> </ul>

Definitions	
Affiliates	Financial and nonfinancial companies related by common ownership or control. *Our affiliates include other business entities of the Tribe.
Non-Affiliates	Financial and nonfinancial companies not related by common ownership or control.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. *Pave Credit does not jointly market.

### Links to Other Websites

This Site may contain links to or from other websites. This privacy policy only applies to information collected on this Site, and we are not responsible for other website's privacy practices. Please be aware of when you exit our Site using such links. We encourage you to review the privacy practices of all other websites you reach through links on our Site.

### Changes to the Privacy Policy

We may update this privacy policy at any time. We will post any changes in our privacy practices on this page with the date of the most recent revision indicated next to "Last updated" near the top of the page. If we make significant changes to the way we manage our visitors' personal information, we will notify you by email or by posting prominent notice on our Site. It is your responsibility to ensure we have your current email address and to periodically check this page for any updates.

### Notification Procedures

We reserve the right to determine the most appropriate means of providing you with any notice required or advisable, in our sole discretion, under the terms of this privacy policy or as required by law. We may choose to provide notification by email, physical written notice, posting prominently on the Site, or through other conspicuous means.

## Opt-Out Procedures

As your privacy is important to us, we provide you with the following procedure(s) for opting out of future communications from us:

- **Email.** Send an email to [optout@Pavecredit.com](mailto:optout@Pavecredit.com) explaining the specific communications or privacy practices you want to opt out of. You may also opt out by clicking "unsubscribe," or a similar button, at the bottom of any emails we may send you and then following the online instructions. However, please note that it may not be possible to opt out of certain emails (for example, confirmation emails related to services you have requested).
- **Phone.** Call **855-801-7283** to receive help from our customer support team to opt out.

Opt-out requests will be honored immediately but please allow up to 30 days for previously initiated marketing campaigns to cease. Opt-out requests do not apply to non-marketing, informational communication from Pave Credit.

## Additional rights for California residents under the CCPA

- Under the CCPA, California residents have the right to know and access your personal information.
  - o Know the categories of personal information we collect and the categories of sources from which we got the information;
  - o Know the business or commercial purposes for which we collect and share personal information;
  - o Know the categories of third parties and other entities with whom we share personal information; and
  - o Access the specific pieces of personal information we have collected about you.

To request this information, please email your name, email address, California postal address as well as your loan ID, if you have one to [CCPA@PaveCredit.com](mailto:CCPA@PaveCredit.com). You may also exercise your right by calling **855-801-7283**.

- **Right to deletion.** In some circumstances, you may ask us to delete your personal information. To request deletion of your information, please email your name, email address, California postal address as well as your loan ID, if you have one to [CCPA@PaveCredit.com](mailto:CCPA@PaveCredit.com). You may also exercise your right by calling **855-801-7283**.
- **Right to opt out of sales.** We may share your personal information with third parties in ways that may constitute a "sale" under CCPA. You may request that we not "sell" your personal information on a going forward basis. To do so, please email your name, email address, California postal address as well as your loan ID, if you have one to [CCPA@PaveCredit.com](mailto:CCPA@PaveCredit.com). You may also exercise your right by calling **855-801-7283**. If you reengage with us after opting out of the "sale" of your personal information, such as obtaining a new loan, signing up for a newsletter and/or entering a sweepstakes or contest your personal information will be collected and used in accordance with this Privacy Notice.
- **Right to be free from discrimination.** You may exercise any of the above rights without fear of being discriminated against. We are permitted to provide a different price or rate to you if the difference is directly related to the value provided to you by your data.

For any of the above mentioned rights, you may designate an authorized agent to make a request on your behalf. In the request, you or your authorized agent must provide including information sufficient for us to confirm the identity of an authorized agent. We are required to verify that your agent has been properly authorized to request information on your behalf and this may take additional time to fulfill your request.

We will use the information you provide to make your CCPA rights requests to verify your identity, identify the personal information we may hold about you and act upon your request. We strongly recommend that you submit the email and postal address that you used when you created accounts or signed up for a newsletter. If you are a California resident and have any questions regarding your CCPA rights under this Privacy Notice, please contact us at [CCPA@PaveCredit.com](mailto:CCPA@PaveCredit.com).

**Third-Party Advertisers.** Pave Credit utilizes 3<sup>rd</sup> party marketers to promote its products and services. Third-party marketers initiate marketing campaigns using information in their own databases. Pave Credit does not share your information. Opt-out request made to us will not necessarily prevent marketing from third-party marketers who rely upon their own mailing and contact lists.

**Third-Party Tracking.** We cannot control the privacy practices of third parties that use cookies, web beacons, or other tracking technologies associated with their content on the Site to collect information about your activities over time and across different websites. These third parties are subject to their own privacy policies, not this one. However, these third parties may provide procedures for opting out. Please review their privacy policies for more information. Additionally, you may opt out of tracking from members of the Network Advertising Initiative (NAI) by visiting its [Consumer Opt-Out Page](#).

**Cookies.** In order to opt out of cookies and other tracking technologies, you can configure or disable cookies in your browser settings. However, please note that doing so may cause parts of the Site to function improperly.

**Contact Us.** Your feedback is important to us. To send us your questions, suggestions, or complaints, please contact us as follows:

**Salt Point Financial dba Pave Credit**

PO Box 6483

Santa Rosa, CA 95406

**support@Pavecredit.com**

**855-801-7283**