



PRIVACY POLICY

This privacy policy applies to wagslending.com and all subdomains of wagslending.com (the “Website”), owned and operated by Bristlecone, Inc (“Bristlecone”, “we” or “us”). Your privacy and the protection of your personal information are important to us. Because we collect and/store certain types of information from you and about you, it is necessary to explain our policy, including the terms and conditions surrounding the collection and use of that information.

Personal information means any information about you, identifies you, and that you or a third party provides to us in connection with the closed-end consumer lease.

This Privacy Policy discloses what information we collect, how we use that information, as well as the choices you can make about the way your information is collected and used. Please read this Privacy Policy carefully to understand what we do.

<u>FACTS</u>	WHAT WE 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.
What?	<p>We collect personal and financial information from you while you use the Website, and most of this collection occurs during the prequalification and application process. Some information is required and some is optional.</p> <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none">• Social Security number and income• Account balances and payment history• Credit history and credit scores• Driver’s License• Bank account information• Mobile Identifiable Information (See detail below) <p>In addition, we gather names and emails addresses of people who contact us through our Website with questions about our company or</p>



	<p>lending operations. We collect this information for the purpose of responding to such inquiries.</p> <p>We also collect information about your computer hardware or software. This information may include your IP address, browser type, domain names, access times, and referring website addresses. We (and/or our service providers) use this aggregated information in the administration of our Website to improve its usability and to evaluate the success of certain marketing/advertising campaigns. We (and/or our service providers) use non-identifying and aggregated information to help optimize our Website based on the needs of our users. This information may also be collected by Google Analytics (www.google.com/policies/privacy/partners/).</p> <p>You authorize your wireless operator to use your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber status details, if available, to allow verification of your identity and to compare information you have provided to GIAC with your wireless operator account profile information for the duration of the business relationship with us.</p>
How?	<p>All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Bristlecone choose to share; and whether you can limit this sharing. When you are no longer our customer, we continue to share your information as described in this policy.</p>

<u>Reasons we can share your personal information</u>	Does Bristlecone share?	Can you limit this sharing?
<p>For our everyday business purposes, including sharing with our third-party service providers:</p> <p>for business-related purposes such as to process your pre-qualification request and your application with us, to process transactions, to process your payments to us, to maintain your account(s) with us, to report</p>	Yes	No



<p>to credit bureaus, to enforce our contracts with you, to collect payments of any debts owed to us, for purposes of detecting and preventing fraud, to perform audits, to meet regulatory, risk management and security requirements, to respond to court orders, to respond to legal or regulatory incidents, for the purpose of scoring and improving our algorithms, retro-scoring for potential use of new products (third-party or otherwise), and as permitted or required by any applicable law</p> <p>We may also use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets for the purposes of evaluating and/or performing the proposed transaction(s). Assignees or successors of our business or assets may use and disclose your personal information for similar business-related purposes as described in this Privacy Policy.</p>			
For our marketing purposes: to offer our products and services to you		Yes	No
For joint marketing with other financial companies		Yes	No
For our affiliates' everyday business purposes: information about your transactions and experiences		Yes	No
For our affiliates' everyday business purposes: information about your creditworthiness		Yes	Yes
For our affiliates to market to you		Yes	Yes
For nonaffiliates to market to you		Yes	Yes*
To limit our sharing	Call [1-844-761-4950] —to discuss your options with a customer service representative.		



	<p>Please note:</p> <p>If you are a <u>new</u> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <u>no longer</u> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at anytime to limit our sharing.</p>
Questions?	Call [1-844-761-4950]

<u>What we do</u>	
How does Bristlecone protect your personal information?	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. We also maintain physical, electronic and procedural safeguards which include computer virus protection software, firewalls, and 256-bit Secure Socket Layer.
How does Bristlecone collect my personal information?	<p>We collect your personal information, for example:</p> <ul style="list-style-type: none">• when you open an account or give us your contact information• provide account information or pay your bills• use your lease <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">• sharing for affiliates' everyday business purposes• information about your creditworthiness• affiliates from using your information to market to you



	<ul style="list-style-type: none"> • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
<u>Definitions</u>	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Bristlecone's affiliates include Wags Lending, Bristlecone Lending, I Do Lending, One Road Lending, Medly, BoonFi, Boon Pet, Boon Auto, Boon Goods, Boon Med, Boon Mobile and Boon Bridal.</i></p>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Nonaffiliates we share with can include the retailer named on your account, Monterey Financial Services, Smoke, MedCentric and direct marketing companies.</i></p>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Our joint marketing partners include medical companies.</i></p>
<u>Other important information</u>	
<p>Compliance with State and Federal Laws. We follow state law if state law provides you with additional privacy protections. For instance, if (and while) your billing address is in Vermont, we will treat your account as if you had exercised the opt-out choice described above and you do not need to contact us to opt out. If you move from Vermont and you wish to restrict us from sharing information about you as provided in this notice, you must then contact us to exercise your opt-out choice. This Privacy Policy may not constitute your entire set of privacy rights, as these may also vary from state to state. To be certain of your privacy rights, you may wish to contact the appropriate agency in your state that is</p>	



charged with overseeing privacy rights of consumers. We will retain your information so as long as your account is active, as needed to provide services, or as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, or comply with applicable federal and state laws regarding recordkeeping, reporting, and audits.

Communications from Our Site. When you register with our Website through the prequalification and application process, you may receive emails or text messages that confirm specific actions you requested in the prequalification, application, and lease processing stages. These are transactional notifications that you cannot opt out of receiving, as they are in place to protect the security of your account and your personal information. We may also send you responses to emails you send us, if appropriate or applicable. From time to time, we will also send user surveys, requests for user feedback regarding user experience and site operations or marketing offers from us or from us on behalf of our marketing partners. If you do not wish to receive these offers, surveys or user feedback emails, please opt out in any offer email you receive from us.

Links to Third Party Websites. We are not responsible for the information practices employed by sites linked to or from our Website. In most cases, links to non-Bristlecone Websites are provided solely as an access point to obtain information on products and topics that may be useful to the users of this Website. Third party websites have different policies and/or security standards governing their sites.

*Please keep in mind that, as permitted by federal law, if you opt out of sharing with nonaffiliates, your opt-out will not prohibit us from sharing your information Bristlecone, Inc. (and its affiliates) in connection with maintaining and servicing the your closed-end consumer lease, including marketing of such programs and affiliate programs.

The above notice replaces our previous privacy notice disclosures to you. We can change our privacy policy at any time and will let you know if we do by either posting them on this Website (please check regularly for new notices) and/or notifying you via email prior to the change becoming effective, is applicable.

For helpful information about identity theft, visit the Federal Trade Commission's (FTC) consumer website at <https://www.identitytheft.gov>.