SUNLIGHT FINANCIAL PRIVACY POLICY

Last updated December 6, 2021

INTRODUCTION

Sunlight Financial LLC ("Sunlight", “we” or “us”) respects your privacy and expectation of security over your financial information and is committed to protecting it through compliance with this Privacy Policy. This Privacy Policy describes the type of information we collect from you when you visit the Sunlight website or use the Sunlight mobile application, Orange® (collectively, the “Services”), as either the consumer applicant for solar or home improvement financing or the consumer user of payment services (“consumer” or “you”), as a contractor working with Sunlight to provide solar or home improvement financing or payment services (“contractor” or “you”), or as an investor, potential investor or other Services user (“you” or “Services user”). This Privacy Policy is designed to inform you of the types of information we collect, how we use that information, and the circumstances under which we will share it with others.

Sunlight provides all consumers with an initial Privacy Notice ("Privacy Notice"). Pursuant to the Gramm-Leach-Bliley Act, Sunlight is required to provide a Privacy Notice to every consumer using Sunlight’s Services, informing the consumer (a) why Sunlight collects their information, (b) what specific information Sunlight collects, (c) how Sunlight collects their information, (d) what information Sunlight shares, and (e) whether or not a consumer can limit Sunlight from sharing their information.

If you do not agree with our policies and practices, please do not use the Services. This Privacy Policy may change from time to time; the date the Privacy Policy was last revised is identified at the top left of the page. Your continued use of the Services after we change the Privacy Policy means you accept those changes, so please check back periodically for updates.

WE RESPECT YOUR PRIVACY

Sunlight respects your privacy and is committed to treating your information responsibly. We believe many consumers appreciate receiving offers of products and Services that may be useful to them. At the same time, we understand the need to safeguard sensitive information that you have provided to us. We treat our consumers’ and contractors’ information as described in this required notice.

Information Collection

From Consumers

Sunlight collects information about you that we reasonably believe will be necessary or useful in processing or administering the products and Services you have requested.
We collect consumer information from the following sources: (1) information we receive from you on application or other forms, such as your name, address, social security number, date of birth, assets, income, and payment information, (2) information about your transactions with our lending partners, channel partners or others, such as your invoice amount, account balance, and payment history, (3) information we receive from third parties, including consumer reporting agencies, such as your creditworthiness and credit history, and (4) your IP address, computer or device information and usage information when you visit our website or complete our loan documents.

From Contractors

Sunlight collects information about you that we reasonably believe will be necessary or useful in processing or administering the products and Services which you, as a contractor, are involved in providing to consumers.

We collect contractor information that includes the following: (1) contractor legal entity name and information, including individual personnel contact information; (2) information about transactions originated through an individual contractor; (3) information we receive from third parties, such as from commercial credit reporting agencies, regarding contractor creditworthiness and credit history; (4) your IP address, computer or device information and usage information when you visit our website, and (5) other information you may provide or which we collect about your business when you register as a contractor with us.

From Services Users

Sunlight collects information about you that we reasonably believe will be necessary or useful in improving the user experience when using our Services.

We collect Services user information that includes the following: (1) information automatically collected when you visit or interact with the Services, through technology such as cookies (described below), clear GIFs, pixel tags, log files, and other technologies including analytics and tracking tools from third-party service providers, which information often includes computer or device information, IP address, and usage information as well as (2) information that you provide to us, which may include when you use our Services, register or create an online account with us, request information from us, sign up for newsletters or our e-mail list, enter into sweepstakes or other promotions, fill out a survey, request customer support, or otherwise communicate or contact us, such as your name, address, e-mail address, telephone number, referrals, and information about your solar activities, such as home ownership, home statistics, home energy usage or utility provider, or demographic information.

Cookies
Our online Services use features of your Internet browser called “cookies” and “flash objects.” Cookies and flash objects are files that are placed in your computer’s browser memory or placed on your hard drive. We may use these features on our websites (collectively, “Sites”) or online banking service to verify your identity, remember personal settings including your preferences, to offer you additional options or enhance your online experience, and to improve our products and Services. We also use them for tracking of online applications and programs. Our server recognizes and records the IP address and/or domain name from which visitors to our site accessed the Internet and the names of the pages visited while at our Sites. It does not, however, collect and store your electronic mail address or other nonpublic personal information. Finally, we also may use cookies to track the effectiveness of advertisements for Sunlight products and Services, referred to as banner ads, that we may place on our Sites. Cookies used for tracking advertising effectiveness do not collect nonpublic personal or confidential information.

INFORMATION SHARING FOR BUSINESS PURPOSES

Sunlight does not share your information with any affiliated or nonaffiliated third parties except when (a) it is required to complete your transaction, (b) you authorize us to do so, or (c) as permitted by law.

For Consumers

Examples of when Sunlight may share your information to complete a transaction you requested would be to (a) verify your title to the relevant property, (b) submit your information to the lender on your loan, or (c) process a payment on your behalf to your contractor. Other examples of how we use your information would be to report your account information to the consumer reporting agencies and to protect your account against, identifying, and preventing fraud and other crime, claims and other liabilities. Sunlight does not sell your personal information. We may disclose your personal information to third-party companies for those third parties to market their products and services to you only if you consent to such sharing.

For direct payments to contractors by credit or debit card or by electronic funds transfer from a bank account (ACH), Sunlight partners with Stripe to process payments to your contractor on your behalf. Sunlight shares information with Stripe and its affiliates to process these payments.

Stripe’s privacy policy is available here.
**For Contractors**

We may share information about your business to complete a payment transaction on your behalf. We may also share information with third parties who we or you conduct business with such as referral partners and for internal business analysis or other business purposes.

**For Services Users**

We may share information about you and your usage of the Services to personalize your experience with the Services, target our communications regarding products, services, or other offers, and for internal business analysis or other business purposes.

**INFORMATION SHARING WITH THIRD PARTY MARKETING SERVICE PROVIDERS AND JOINT MARKETERS**

Sunlight may disclose the information we collect, as described above, to companies that perform marketing services on our behalf. The third-party service providers who receive this information are required to use the information we share with them only to provide services to us, or as otherwise permitted by law.

**REVOCATION OF CONSENT**

If you would like to revoke your consent for Sunlight and its business partners to call you to offer you products and services to serve your financial needs, please call us toll-free at (888) 850-3359 or send a written request to Sunlight Financial LLC, 101 N. Tryon Street, Suite 1000, Charlotte, North Carolina 28246.

**MAINTENANCE OF ACCURATE INFORMATION**

We have established procedures designed to ensure that your information is as accurate and complete as possible. If you believe that our records contain inaccurate or incomplete information about you, please notify us by calling toll-free at (888) 850-3359 or by sending a written inquiry to Sunlight Financial LLC, 101 N. Tryon Street, Suite 1000, Charlotte, North Carolina 28246.

**CONFIDENTIALITY AND SECURITY**

We restrict access to your loan application, payment information, or business information to those teammates (persons employed by Sunlight) who have a business reason for knowing such information. We educate our teammates about the importance of confidentiality and privacy of consumer information.
We maintain physical, electronic and procedural safeguards that comply with federal standards to protect your information from unauthorized access. We do not allow our teammates, independent contractors or third-party service providers to use this information or to share it for any purpose other than to provide services on our behalf or as required by law or regulation. Sunlight may provide documentation about your transaction in response to a court order or subpoena, for example. If you discontinue the use of our Services, we will retain historical information about your transactions, including personal information, as per our record retention requirements.

IN SUMMARY

We appreciate your interest and want you to understand our commitment to maintaining the privacy of your information, as expressed in this Privacy Policy. We reserve the right to amend this Privacy Policy at any time. If you have questions about this Privacy Policy, please contact our support line at (888) 850-3359.

FOR CALIFORNIA CONSUMERS

If you are a California consumer, the information below also applies to you. Certain terms used in this section have the meaning given to them in California Civil Code § 1798.100 et seq. and in the California Consumer Privacy Act Regulations § 999.300 et seq.

Collection and Disclosure

During the 12-month period prior to the effective date of this Privacy Policy, we may have:

a. Collected the following categories of personal information about you:

   • identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, date of birth, Social Security number, driver’s license or state identification card number, passport number, applicable issue and expiration date of government documents, issuing agencies of government documents, mother’s maiden name, and other similar identifiers;

   • signature, physical characteristics or description, address, telephone number, insurance policy number, education, bank account and routing number, credit and/or debit card number, expiration date and card verification code, credit history, or any other financial information, medical information, and health insurance information;

   • characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status;
• commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies;
• Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements;
• geolocation data;
• audio, electronic, visual, and similar information;
• professional or employment-related information, such as employment/occupation, employer name, employment history, income; and
• inferences drawn from any of the information identified above used to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

b. Collected personal information about you from the following categories of sources:

• from you or your devices, for example, through your interaction with our teammates or our Sites; and
• third parties such as the contractor for your home improvement project, through their use of the Sites.

c. Collected personal information about you for the following business or commercial purposes (in addition to the purposes listed in our Privacy Policy):

• performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services;
• auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
• short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
• detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
• debugging to identify and repair errors that impair existing intended functionality;
• undertaking internal research for technological development and demonstration; and
• undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance a service or device that is owned, manufactured, manufactured for, or controlled by us.

d. Shared your personal information with the following categories of third parties:

• national consumer reporting agencies, such as Experian, Equifax or Transunion, and
• our customers and partners, to inform them about your use of our products and services or, with your consent, for them to market their services to you.

e. Disclosed for a business purpose the following categories of personal information about you:

• identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, date of birth, Social Security number, driver’s license or state identification card number, passport number, applicable issue and expiration date of government documents, issuing agencies of government documents, mother’s maiden name, and other similar identifiers;
• signature, physical characteristics or description, address, telephone number, insurance policy number, education, bank account and routing number, credit and/or debit card number, expiration date and card verification code, credit history, or any other financial information, medical information, and health insurance information;
• characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status;
• commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies;
• Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements;
• geolocation data;
• audio, electronic, visual, and similar information;
• professional or employment-related information, such as employment/occupation, employer name, employment history, income; and
• inferences drawn from any of the information identified above used to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

California Consumer Privacy Rights

You may have the right to request, twice in any 12-month period, the following information about the personal information we have collected about you during the previous 12 months:

• the categories and specific pieces of personal information we have collected about you;
• the categories of sources from which we collected the personal information;
• the business or commercial purpose for which we collected the personal information;
• the categories of third parties with whom we shared the personal information; and
• the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.

In addition, you have the right to request that we delete the personal information we have collected from you. Sunlight does not sell your personal information. If you choose to exercise these rights, we will not deny, charge different prices for, or provide a different level or quality of goods or services to you.

To submit a request, you may contact us at info@sunlightfinancial.com or (888) 850-3359. To help protect your privacy and maintain security, we take steps to verify your identity before granting you access to your personal information or complying with your request. You may also submit a request through an authorized agent, meaning a person or business registered to conduct business with the California Secretary of State who you have authorized to act on your behalf. If you submit a request through an authorized agent, Sunlight will require the authorized agent to submit signed permission from you to make the request or a power of attorney. We may also call you to verify your identity and may deny a request from an authorized agent that does not submit proof of authorization to act on your behalf. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.