

## AMPLIFIED CREDIT PRIVACY POLICY

Last updated December 12, 2023

This privacy policy (“**Privacy Policy**”) describes how and why Focus Point Inc. dba Amplified Credit and its subsidiaries, affiliated companies and/or brands (collectively, “**Company**,” “**we**,” “**us**,” or “**our**”) might collect, store, use, and/or share (“**process**”) your information when you use our services, including without limitation the websites and/or applications available at [www.amplifiedcredit.ca](http://www.amplifiedcredit.ca) (the “**Website**”), and/or engage with us in other related ways, including any sales, marketing, or events (collectively, the “**Services**”). Reading this Privacy Policy will help you understand your privacy rights and choices.

**BY USING THE SERVICES, YOU AGREE YOU HAVE READ OUR TERMS OF USE AND THIS PRIVACY POLICY IN THEIR ENTIRETY, UNDERSTAND, AND FULLY ACCEPT OUR TERMS OF USE AND THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO ACCESS OR USE OUR SERVICES AND MUST PROMPTLY DISCONTINUE USING AND EXIT THE SERVICES. IF YOU DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO ACCESS OR USE OUR SERVICES AND MUST PROMPTLY DISCONTINUE USING AND EXIT THE SERVICES.**

### 1. WHAT INFORMATION DO WE COLLECT?

We collect information that you voluntarily disclose and that we automatically collect when you (i) express an interest in obtaining information about us, our products and/or the Services, (ii) use or participate in the Services, or (iii) communicate with us. The types of information we collect includes:

#### **Personally Identifiable Information (PII)**

We collect personally identifiable information (“**PII**”), which may specifically identify you, depending on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The PII we collect may specifically identify you, including names, phone numbers, email addresses, mailing addresses, credit card and/or billing information, job titles, contact preferences, geolocation data, contact or authentication data, and any other identifiers which you may be prompted to provide in connection with accessing or using the Services.

#### **Non-Personally Identifying Information (Non-PII)**

We automatically collect non-personally identifying information (“**Non-PII**”) when you access or use the Services. Non-PII does not reveal your specific identity but may include device and usage information, such as your IP address, browser settings, device and hardware information, operating system, internet service provider and/or mobile carrier, language preferences, referring URLs, diagnostic and performance data, geolocation data, information about how and when you use the Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

#### **Nonpublic Personal information (NPI)**

We collect nonpublic personal information (“**NPI**”), which may specifically identify you in connection with financial products or services. The NPI we collect may include your income, billing information, Social Security Number, bank account numbers, account balances, debit and/or credit card information, brokerage account numbers, payment history, or any other identifiers which you may be prompted to

provide in connection with accessing or using the Services. Please review this our Notice Regarding Nonpublic Personal Information for more information regarding our use and disclosure of, as well as your rights regarding, your NPI.

## **2. DO WE USE COOKIES OR OTHER TRACKING TECHNOLOGIES?**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

“Cookies” (or browser cookies), are small files placed on the hard drive of your computer when you access or use the Website that deliver content specific to you. The cookie will be enabled for a set period of time, typically 30 or 60 days, after which the cookie expires. Acceptance of cookies is not required to access or use the Website or Services, however, certain areas and features of the Website and/or Services may require cookies to function properly.

“Web beacons” (or clear gifs, pixel tags or web bugs), are tiny graphics with a unique identifier placed in the code of the Website. Web beacons monitor your traffic patterns from webpage to webpage within our sites, deliver or communicate with cookies, register if you navigated to the Website from an online advertisement displayed on a third-party website, and help us improve Website and/or Services performance.

Some content, including advertisements, on the Website and/or Services are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third-parties may use cookies, web beacons or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based advertising or other targeted content. We do not control these third-parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **3. HOW DO WE PROCESS YOUR INFORMATION?**

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

**Deliver and facilitate delivery of services.** We may process your personal information to provide you with the requested service.

**Process payment for Membership and/or other transactions.** We may process your personal information to facilitate payment for your Membership (as it is defined in our Terms of Use) and/or other transactions you initiate with us.

**Respond to user inquiries/offer support.** We may process your personal information to respond to your inquiries and solve any potential issues you might have with the requested service.

**Send administrative information.** We may process your personal information to send you details about our products and services, changes to our terms and policies, and other similar information.

**Enable user-to-user communications.** We may process your personal information if you choose to use any of our offerings that allow for communication with another user.

**Request feedback.** We may process your personal information when necessary to request feedback and to contact you about your use of our Services.

**Send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes if that is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see [\*\*WHAT ARE YOUR PRIVACY RIGHTS?\*\*](#) below.

**Deliver targeted advertising.** We may process your personal information to develop and display personalized content and advertising tailored to your interests, location, and more.

**Post testimonials.** We may post your User Content (as it is defined in our Terms of Use), including but not limited to, testimonials on our Services that may contain personal information.

**Evaluate and improve our Services, products, marketing, and your experience.** We may process your personal information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.

**Determine the effectiveness of our marketing and promotional campaigns.** We may process your personal information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

**Comply with our legal obligations and rights.** We may process your personal information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.

**Fulfil other purposes.** We may process your personal information to fulfil any other purpose as otherwise described to you at the point of collection.

#### **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents (each a "**third-party**" and collectively the "**third-parties**") who perform services for us or on our behalf and require access to such information to do that work. The categories of third-parties we may share personal information with are as follows:

- payment processors;
- ad networks;
- communication & collaboration tools;
- sales & marketing tools;
- social networks; and
- retargeting platforms

We also may need to share your personal information in the following situations:

**Processing payment.** We may share your personal information to facilitate payment of a Membership and/or other transactions you initiate with us through a third-party service provider, such as Stripe.

**Business transfers.** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Sharing with Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

**Sharing with Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

**Complying with Legal Obligations.** We may disclose information you provide, including your PII, if required to do so by law or if we believe, in our sole discretion, that disclosure is reasonably necessary to: (a) comply with federal, state, or local law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law); (b) protect or defend us or a third-party's rights or property; (c) protect someone's health or safety, such as when harm or violence against any person (including you) is threatened; and/or (d) prevent fraud.

**Aggregating Information.** We may share aggregate information that does not include PII, and we may otherwise disclose Non-PII with third-parties for industry analysis, demographic profiling and other purposes. Any aggregate information shared in these contexts will not contain your PII.

## **5. THIRD-PARTY WEBSITES**

The Website and/or Services may contain links to third-party owned and/or operated websites. **WE ARE NOT RESPONSIBLE FOR PRIVACY PRACTICES OR THE CONTENT OF SUCH WEBSITES.** We suggest that you contact these third-parties directly for information regarding their privacy, security, and data collection and distribution policies prior to providing them with any information.

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third-parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website and/or Service, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website and/or Services.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## **8. DO WE COLLECT INFORMATION FROM MINORS?**

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 years old or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to

promptly delete such data from our records. If you become aware of any information we may have collected from children under age 18, please contact us at [legal@amplifiedcredit.ca](mailto:legal@amplifiedcredit.ca).

## **9. WHAT ARE YOUR PRIVACY RIGHTS?**

### **Withdrawing Your Consent**

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section **HOW CAN YOU CONTACT US ABOUT THIS NOTICE?** below. However, please note that this will not affect the lawfulness of the processing of your personal information before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

### **Opting Out of Marketing and Promotional Communications**

You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section **HOW CAN YOU CONTACT US ABOUT THIS NOTICE?** below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

If you do not want us to share your information with nonaffiliated or non-agent third-parties for promotional purposes, by contacting us using the details provided in the section "**HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**" below.

### **Cookies and Other Technologies**

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or portions of our Services. We do not control third-parties' collection or use of your information to serve interest-based advertising. However, these third-parties may provide you with ways to choose not to have your information collected or used in this way. Most web browsers maintain a "help" section on the toolbar that provides more information about cookies. Please refer to this "help" section for information on how to receive notifications when you are receiving a new cookie and how to turn cookies off.

Geolocation data can be either precise or imprecise, and how much geolocation information we collect depends on the type and settings of the device you use to access the Website and/or Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device, *however*, if you choose to opt out, you may not be able to use certain aspects of the Services.

## **10. YOUR STATE PRIVACY RIGHTS**

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah, may have additional personal information rights and choices. Please [click here](#) for more information about your state privacy rights. If you have questions or comments about your privacy rights, you may email us at [legal@amplifiedcredit.ca](mailto:legal@amplifiedcredit.ca).

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“**DNT**”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## 12. **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Under applicable law, you or someone legally authorized to act on your behalf (your “**authorized agent**”), may make a request to access, correct or delete your personal information. You may, under applicable law, also make a request to know or delete personal information on behalf of your child. Requests or exercise of your right(s) can be made by:

- emailing us at [legal@amplifiedcredit.ca](mailto:legal@amplifiedcredit.ca)
- calling us at (\_\_\_\_) \_\_\_\_-\_\_\_\_
- sending us a written request by mail to:

Focus Point Inc. dba Amplified Credit  
1448 Quail Run  
Nashville, TN 37214

A request or exercise of your right(s) must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent, and should include: (i) the state of which you are a resident; (ii) a description of your request/exercise of your right, with sufficient detail that allows us to properly understand, evaluate, and respond; and (iii) identifying personal information.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm your information.

We will only use your information provided in the request to verify the requestor’s identity or authority to make said request. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We will only use your information provided in the request to verify the requestor’s identity or authority to make said request. Please note that we cannot delete your personal information except by also deleting your Account, if any. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## 13. **GOVERNING LAW**

We control and operate the Website and provide the Services from the United States. The Website and Services is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. We do not represent or warrant that the Website or Services is appropriate for use in any particular jurisdiction. Those who choose to access the Website and/or Services do so at their own initiative and are responsible for complying with all applicable international, federal, state, and local laws, rules, and regulations.

#### **14. INTERNATIONAL USERS**

This section is applicable only to users who access, use or interact with the Services in countries outside the United States, including without limitation the European Economic Area (“**EEA**”), and supplements certain sections of this Privacy Policy and provides additional information that should be read together with all other sections of this Privacy Policy. To the extent there is any conflict between this section and the other sections of the Privacy Policy, this section shall govern.

The laws of some jurisdictions, such as the European Union, require companies to tell you about the legal basis for using, sharing, or disclosing your information. To the extent those laws apply, we may rely on the following legal bases:

When this Privacy Policy mentions the “**Company**”, “**we**”, “**our**” or “**us**”, it refers collectively to Focus Point Inc. dba Amplified Credit and its subsidiaries and affiliated companies and/or brands to the company or companies responsible for your information under this Privacy Policy (or “**Data Controller**”).

The laws of some jurisdictions, such as the European Union, require companies to tell you about the legal basis for using, sharing, or disclosing your information. To the extent those laws apply, we may rely on the following legal bases:

**performance of a contract:** where use of your information is necessary to provide you with the Services under a contract, for example the Terms of Use.

**legitimate interest:** where use of your information is necessary for our or others’ legitimate interests and where the use is not outweighed by your rights and interests. Below are some examples of such interests:

- providing the Services;
- improving the Services and developing new ones;
- recognizing and better understanding our users, including across platforms;
- conducting security and fraud prevention activities;
- marketing and promoting our content and services;
- building and managing business relationships;
- conducting compliance and risk management activities; and
- providing and managing access to our systems

**legal obligation:** where use of your information is necessary to comply with laws and regulations such as those relating to anti-bribery and corruption and anti-money-laundering, complying with requests from government bodies or courts, or responding to litigation.

**with consent:** we may ask for your consent to process your information in a certain way. Where we rely on this basis, you have the right to withdraw your consent at any time – please see **WHAT ARE YOUR PRIVACY RIGHTS?** above to do this.

#### **15. DO WE MAKE UPDATES TO THIS NOTICE?**

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated “last updated” date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

#### **16. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

We welcome your comments and questions regarding our privacy policies. If you have any questions about this Privacy Policy, please contact us at:

Focus Point Inc. dba Amplified Credit  
1448 Quail Run  
Nashville, TN 37214  
[legal@amplifiedcredit.ca](mailto:legal@amplifiedcredit.ca)



**AMPLIFIED CREDIT  
NOTICE REGARDING NONPUBLIC PERSONAL INFORMATION**

FACTS	WHAT DOES AMPLIFIED CREDIT DO WITH YOUR PERSONAL INFORMATION?
<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• bank and/or brokerage account information</li> <li>• debit and/or credit card information</li> <li>• billing information</li> <li>• account balances and payment history</li> <li>• credit history and credit scores</li> <li>• Social Security number and income</li> </ul>
<b>How?</b>	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 Amplified Credit chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Amplified 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 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	No
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<b>To Limit Our Sharing</b>	<ul style="list-style-type: none"> <li>• Call <b>tel.</b>—our menu will prompt you through your choice(s)</li> <li>• Email us at <a href="mailto:legal@amplifiedcredit.ca">legal@amplifiedcredit.ca</a></li> <li>• Visit us online at <a href="http://www.amplifiedcredit.ca">www.amplifiedcredit.ca</a></li> <li>• Complete and mail the Mail-In Form below</li> </ul> <p>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 our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call tel., email <a href="mailto:legal@amplifiedcredit.ca">legal@amplifiedcredit.ca</a> , or go to <a href="http://www.amplifiedcredit.ca">www.amplifiedcredit.ca</a>
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<b>MAIL-IN FORM</b>		
<p>Mark any/all you want to limit:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li> <li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li> <li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li> </ul>		
<b>Name</b>		<b>Mail to:</b> Focus Point Inc. dba Amplified Credit Attn: Legal 1448 Quail Run Nashville, TN 37214
<b>Address</b>		
<b>City, State, Zip</b>		
<b>Email Address</b>		

<b>WHO WE ARE</b>	
Who is providing this notice?	Focus Point Inc. dba Amplified Credit
<b>WHAT WE DO</b>	
How does Amplified Credit protect my 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.
How does Amplified Credit collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• register an account/membership</li> <li>• access our coaching, counseling or guidance services</li> <li>• contact us, whether by e-mail, text, phone calls, posts, or in writing</li> </ul> <p>We also collect your personal information from 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 purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. <a href="#">Click here for more on your rights under state law.</a></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.
<b>DEFINITIONS</b>	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• None</li> </ul>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• None</li> </ul>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• None</li> </ul>
<b>OTHER IMPORTANT INFORMATION</b>	

