

Populus Financial Group, Inc. ("PFG")
PRIVACY POLICY

OVERVIEW

- A) Introduction. This Privacy Policy ("Privacy Policy") is meant to help you understand how we collect, use, secure, retain, and, in certain circumstances, disclose personal information/data. This Privacy Policy applies to both your online and offline interactions with us, including through any of our online interfaces (whether on desktop or mobile websites, or through our mobile applications), including www.populusfinancial.com, www.acecashexpress.com, and www.joinporte.com (each, a "Site"), and wherever this Privacy Policy is posted or linked.

This Privacy Policy applies to all PFG companies, affiliates, and subsidiaries that offer products and services, including Populus Financial Group, Inc., including its stores doing business under the name of ACE Cash Express, ACE America's Cash Express, ACE Credit Services, LLC, ACE South Carolina, LLC, ACE Cash Express Title Loans LLC, and ACE Payment Services, Inc. (collectively, "PFG," "we," "us," or "our").

This Privacy Policy applies to users of our Sites, products, and services, but if you are a consumer or customer who applied for or obtained a financial product or service with us, please read the additional financial privacy policy applicable to the financial product or service, as further described below.

Finally, if you are a resident of one of the states identified below, you might have additional state-specific rights with respect to the processing of your personal information that is subject to such applicable state privacy laws ("State Privacy Laws"). For California job applicants, please visit our [California Employee Privacy Policy](#).

- B) Changes to this Privacy Policy. In order to stay up to date with the privacy landscape across the nation and provide you with the most accurate information available, we may update this Privacy Policy from time to time. Any updates will be effective as of the updated date noted above, unless we provide you with notice in accordance with applicable law, which may include a reasonable opportunity to withdraw any prior consent to the changed Privacy Policy.

PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

- A) Personal Information. We collect information that identifies, relates to, describes, or could reasonably be associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household, or to a device that identifies, is linked to, or is reasonably linked to one or more consumers in a household ("personal information"). Personal information does not include deidentified information, aggregated consumer information, or information that is lawfully available through government records or through widely distributed media.
- B) Categories of Personal Information We Collect. In the last 12 months, we collected the following categories of personal information.
- 1) "Identifiers" such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account number, or other similar identifiers;
 - 2) "Other Personal Information" such as name, signature, social security number, taxpayer identification number, physical characteristics or description, address, telephone number,

insurance policy number, education, employment, employment history, bankruptcy status, bank account number, credit card number, debit card number, or any other financial information, or medical information. Some personal information included in this category may overlap with other categories;

- 3) “Protected Characteristics” under California or federal law for classifications such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, or veteran or military status;
- 4) “Commercial Information” such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- 5) “Internet or Network Activity” such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement;
- 6) “Biometric Information” such as physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information;
- 7) “Geolocation Data” such as physical location or movements;
- 8) “Sensory Data” such as audio, electronic, visual or similar information from call recordings and online user sessions;
- 9) “Professional or Employment Related Information” such as current or past job history or performance evaluations;
- 10) “Inferences” drawn from any of the information collected to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- 11) “Sensitive Personal Information” such as
 - (i) Racial or ethnic background, citizenship or immigration status, or national origin, mental or physical condition;
 - (ii) Social Security Number, passport number, driver's license or state identification card;
 - (iii) Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
 - (iv) Precise geolocation;
 - (v) Processed biometric information to identify you.

- C) How We Obtain Your Personal Information and Categories of Sources of Personal Information.
The following table illustrates how we collect personal information and provides examples of sources of personal information:

Directly from you or during our verification process of your request or application for products or services provided by us. You enter or provide us with information in person, online, in our mobile application, by email, by phone, or by document upload.	For example, when you apply for a loan, make a wire transfer, cash a check, show us your government issued ID, or pay your bills.
Directly and indirectly from you based on activity on our Sites or mobile applications.	For example, from submissions through our Sites or mobile application or Site or mobile

	application, usage details are collected automatically.
Directly and indirectly from you during the course of our business relationship.	For example, from contracts or agreements or communications between you and us or when you call for our customer service
From service providers or third parties that interact with us in connection with the products and services we provide. Also, from businesses for whom we are a service provider.	For example, credit reporting agencies, banking institutions, or other service providers and third parties that provide data we use in underwriting or that assist us in verifying your identity, address(es), and information you provide to us or in protecting you and our products from fraud and identity theft. Additionally, from third-party lead generation relationships, who provide customer information obtained from publicly available sources or from customers who have opted-in to disclosing information; and from third parties who aid us in determining whether to use a lead.

- D) How We Use Your Personal Information. We may collect, use, or disclose personal information we collect for one or more of the following business, commercial, or other purposes:
- 1) Performing services on behalf of us or our service providers, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of us or our service providers. This includes to:
 - (i) Fulfill or meet the reason for which the information is provided;
 - (ii) Provide you with information, products, or services that you request from us;
 - (iii) Provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you; and
 - (iv) Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
 - 2) Undertaking internal research for technological development and demonstration;
 - 3) Debugging to identify and repair errors that impair existing intended functionality;
 - 4) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes;
 - 5) Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
 - 6) Undertaking activities to verify or maintain the quality or safety of device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us;
 - 7) For short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about you or otherwise to alter your experience outside the current interaction, including, but not limited to, the contextual customization of advertisements shown as part of the same interaction; and

- 8) To comply with our legal or regulatory obligations.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

- E) How We Disclose Your Personal Information. We may disclose your personal information to a business for whom we are a service provider, our service providers or a third party for a business or commercial purpose.

- 1) We may disclose the following categories of personal information for a business purpose: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric Information, Geolocation Data, Sensory Data, Professional or Employment Related Information, Inferences, and Sensitive Personal Information. When we disclose personal information to a service provider or contractor, we enter into a contract that describes the purpose and requires the service provider to both keep the personal information confidential and not use it for any purpose except performing the services described in the contract or as provided for under applicable State Privacy Laws. Examples of who we disclose personal information with include:
 - (i) Businesses for whom we are a service provider;
 - (ii) Our service providers;
 - (iii) Our Contractors.
- 2) We disclose the following categories of personal information to the following categories of service providers or contractors:
 - (i) With our affiliates we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Geolocation Data, Sensitive Personal Information, Sensory Data, Inferences, and Professional or Employment Related Information;
 - (ii) With our banking and lending relationships we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Professional or Employment Related Information, Sensitive Personal Information, and Geolocation Data;
 - (iii) With credit reporting agencies we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Sensitive Personal Information, Inferences, and Geolocation Data;
 - (iv) With government entities we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Professional or Employment Related Information, Biometric Information, Geolocation Data, Inferences, Sensitive Personal Information, and Sensory Data;
 - (v) With our program processors/servicers, we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Geolocation Data, Sensory Data, Professional or Employment Related Information, Sensitive Personal Information, and Inferences;

- (vi) With advisors such as lawyers, accountants, banks, and insurers, we disclose personal information of the following categories: Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Biometric Information, Internet or Network Activity, Geolocation Data, Professional or Employment Related Information, Sensitive Personal Information, Inferences, and Sensory Data.
- F) Do Not Track Signals. Our Site does not currently respond to Do Not Track signals configured in your web browser.
- G) Social Media. We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about disclosures of information from those platforms and networks with us.

PRIVACY NOTICE FOR CONSUMERS OR CUSTOMERS OF FINANCIAL PRODUCTS OR SERVICES

- A) Privacy Notice. If you are a consumer or customer who applied for or obtained a financial product or service with us, please read the applicable privacy policy notice applicable to the financial product or service.
 - 1) ACE Cash Express Companies. When you apply for or obtain certain financial products or services through our ACE Cash Express companies, either through our Sites, mobile applications, or in person, learn about how we collect, use, protect, and disclose your personal information and the privacy options available to you by reading our [ACE Privacy Policy](#).
 - 2) Banking Related Products or Services. We are a retailer of certain financial products or services, including demand deposit accounts and card products and services, which are established and serviced by our network of service providers and contractors. These products and services include, but are not limited to, Porte® mobile banking app, the Flare Account®, and the ACE Elite® Visa® Prepaid Debit Card.
 - (i) The ACE Elite Visa Prepaid Debit Card is issued by Pathward, National Association, Member FDIC, pursuant to a license from Visa U.S.A. Inc. Porte and the Flare Account are demand deposit accounts established by Pathward, National Association, Member FDIC, and the Flare Account Debit Card and Porte Debit Card are issued by Pathward, N.A., pursuant to a license from Visa U.S.A. Inc. Ouro Global, Inc. is a registered agent/service provider of Pathward, N.A.

As such, each of Pathward and Ouro may have personal information if you have any such products or services. For more information about your personal information related to such products or services, please reach out to Pathward and Ouro directly. To learn more about how the personal information related to such products and services is collected, used, protected, shared, and the privacy options available to you, please read the [Pathward Privacy Policy](#) provided by Pathward, NA.

STATE PRIVACY LAW REQUIREMENTS

- A) Overview. Various states have passed consumer information privacy laws, some of which may grant you additional rights with respect to certain personal information that may be subject to those State Privacy Laws. If you are a resident of one of the states below, please read through this additional information to learn more about such rights available to you.

Please note that many State Privacy Laws exempt or make exceptions for certain processing activities of consumer information, which means that under certain circumstances, we are not required to comply with certain requirements under such State Privacy Laws. For example, some State Privacy Laws do not apply to the following:

- * Publicly available information (e.g., information legally obtained through government records);
- * Deidentified or aggregated consumer information; or
- * Information that is subject to certain other laws, such as: personal information governed by certain industry-specific privacy laws, including the Fair Credit Reporting Act ("FCRA"), the Gramm-Leach-Bliley Act ("GLBA") or California Financial Information Privacy Act ("CalFIPA"), and the Driver's Privacy Protection Act of 1994 ("DPPA").

We publicly commit to maintaining and using deidentified information without attempting to reidentify the deidentified data except as permitted under applicable law.

If you make a request and an exception or exemption applies, we will provide an explanation in our response. For example, we may deny certain requests if the personal information is necessary for us or our service providers or contractors to (if allowed by State Privacy Laws):

- (i) Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer;
- (ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- (iii) Debug to identify and repair errors that impair existing intended functionality;
- (iv) Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- (v) Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- (vi) Enable solely internal uses that are reasonably aligned with your expectations based on our relationship with you and compatible with the context in which you provided the information; or
- (vii) Comply with our legal or regulatory obligations.

- B) Notice at Collection for California Residents: For California residents, the personal information we collect is described above in the section, "[Categories of Personal Information We Collect](#)" We disclose this personal information as described above under "[How We Use Your Personal Information](#)." We do not sell or share your personal information including those of consumers under 16 years of age. We will retain your personal information as described below under "[Retention and Security of Your Personal Information](#)."
- C) California Privacy Rights. If you are a resident of the State of California and there is personal information that is subject to the California Consumer Privacy Act, as amended from time to time and its implementing regulations, ("CCPA") and other California privacy laws, the following rights and additional information apply to you. Any terms defined in the CCPA have the same meaning when used in this Privacy Policy.

- 1) **Sale or Sharing of Personal Information:** We do not sell or share your personal or sensitive personal information. We do not sell or share the personal information of minors under 16 years of age without affirmative authorization.
- 2) **Your Rights Under the CCPA:** The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise those rights (each, a “Request”), if applicable.
 - (i) Right to Know: You have the right to Request that we disclose certain information to you about our collection, use, and disclosure of your personal information over the past 12 months (“Right to Know”). Once we receive and verify your Request, we will disclose to you:
 - (a) For Requests for categories of personal information collected and disclosed:
 - (i) The categories of personal information we collected about you;
 - (ii) The categories of sources for the personal information we collected about you;
 - (iii) Our business or commercial purpose for collecting that personal information;
 - (iv) The categories of third parties with whom we disclose that personal information;
 - (v) If we disclosed your personal information for a business purpose, the categories of personal information disclosed with each category of third-party recipients.
 - (b) For Requests for specific information:
 - (i) The specific pieces of personal information we collected about you. Please be aware that for certain types of personal information, such as your Social Security number, we will inform you whether we have collected the type of information, but we will not disclose the actual piece of information.
 - (ii) Right to Delete: You have the right to Request that we delete any of your personal information that we collected from you, subject to certain exceptions (“Right to Delete”). Once we receive and verify your Request, we will delete, de-identify, or aggregate your personal information (and direct our service providers and contractors to do the same), unless an exception applies.
 - (iii) Right to Opt-Out of Sale or Sharing: Under the CCPA, you have the right to opt-out of the sale or sharing of your personal information (“Right to Opt-Out”). However, we do not sell or share your personal information. Further, we do not sell or share the personal information of minors under 16 years of age without affirmative authorization.
 - (iv) Right to Correct: You have the right to Request that we correct any inaccurate personal information we maintain about you (“Right to Correct”).
 - (v) Right to Limit Use and Disclosure of Sensitive Personal Information: You have the right to Request that we limit our use and disclosure of your sensitive personal information (“Right to Limit Use and Disclosure”). However, we do not use or share your sensitive personal information beyond what is necessary for our ongoing business relationship with you. We also do not use your sensitive personal information to infer characteristics about you.

- (vi) **Right to Non-Discrimination or No Retaliation:** You have the right to not be discriminated or retaliated against for exercising any of your rights under the CCPA (“Right to No Discrimination or Retaliation”). Unless permitted by the CCPA, we will not:
- (a) Deny you goods or services;
 - (b) Charge you higher prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
 - (c) Provide you a lower level or quality of goods or services; or
 - (d) Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

3) **Submitting a CCPA Request:** To make a Request, please contact us by either:

- * Calling us at 800-224-4338
- * Visiting the “Legal & Privacy” section of our Sites and clicking on the [California Privacy Requests](#) link, located near the bottom of the Site.

Only (1) you, (2) a person authorized by you to act on your behalf, or (3) an entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a Request for a Right to Know, Right to Delete, or a Right to Correct related to your personal information. You may also make a request on behalf of your minor child.

A Request must:

- * provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent. Given the sensitivity of your personal information that we collect and retain, we will need to verify your identity with at least 3 separate pieces of information such as name, address, account number, date of birth, last 4 digits of your Social Security number, phone number, etc.; and
- * describe your Request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

You may only make certain Requests up to two times during a 12-month period. We do not charge a fee to process or respond to your Request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the Request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your Request.

- (i) **Authorized Agents.** Before we can respond to a Right to Know, Right to Correct, or Right to Delete Request submitted by an authorized agent, we need to verify not only that person or entity’s authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please email us at CAprivacy@populusfinancial.com and provide the following information:

- * To verify your authorization to submit a request on behalf of a California resident, please attach a copy of one or more of the following to your Request email:
 - California Secretary of State authorization,
 - Written permission from the California resident, or
 - Power of attorney or documentation of acting as a conservator for the consumer.

- * To verify your identity, please attach copies of the following to your Request email:
- valid government-issued ID (not expired); and
 - a utility bill or similar documentation to verify your name and address

To verify the identity of the consumer for whom you are submitting the Request, please submit the required information by calling us at 800-224-4338 or visiting the “Legal & Privacy” section of our Sites and clicking on the [California Privacy Requests](#) link, located near the bottom of the Site.

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 the personal information relates to you. We will only use personal information provided in a Request to verify the requestor’s identity or authority to make the Request.

- 4) **Response Timing and Delivery Method:** We will acknowledge receipt of a Request within 10 business days of its receipt. We will respond to a Request within 45 days of its receipt. If we require more time (up to 45 additional days for a total of 90 days from receipt of the Request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, depending on whether or not you include your email with the Request submission. Any response to a Right to Know that we provide will only cover the 12-month period preceding our receipt of the Request. Responses to any Request that we provide will also explain the reasons we cannot comply with a Request, if applicable.

We may deny your request if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under the FCRA, the GLBA, the FIPA, or the DPPA.

- D) Oregon Privacy Rights. If you are a resident of the State of Oregon and there is personal information that is subject to the Oregon Consumer Privacy Act, as amended from time to time, (“OCA”) and other Oregon privacy laws, the following rights and additional information apply to you. Any terms defined in the OCA have the same meaning when used in this Privacy Policy. For simplicity, we refer to personal information throughout this Privacy Policy, but the OCA refers to this concept as “personal data.”

- 1) **Your Rights Under the OCA:** The OCA provides consumers with specific rights regarding their personal information. This section describes your OCA rights and explains how to exercise those rights through a Request, if applicable.

- (i) You may Request:
 - (a) Confirmation as to whether we are processing or have processed your personal information and the categories of personal information that we are processing or have processed;
 - (b) Either (at our option) a list of specific third parties (other than natural persons) to which we have disclosed:
 - (i) Your personal information; or
 - (ii) Any personal information.
 - (c) A copy of all your personal information that we have processed or are processing;

- (d) For us to correct inaccuracies in your personal information;
- (e) For us to delete your personal information, including personal information you have provided to us and personal information we've obtained from another source;
- (f) To opt-out of our processing of your personal information that we process for any of the following purposes:
 - (i) Targeted advertising;
 - (ii) Selling of personal information; or
 - (iii) Profiling a consumer in furtherance of decisions that produce legal effects or effects of similar significance.

Please note, we do not process your personal information in a way that would qualify as "targeted advertising," a "sale," or as "profiling in furtherance of [significant decisions]," as the terms are used in the OCPA.

2) Submitting an OCPA Request: To make a Request, please contact us by either:

- * Calling us at 800-224-4338
- * Emailing us at CAprivacy@populusfinancial.com

If you are authorized to submit a Request on behalf of an Oregon consumer, please email us at CAprivacy@populusfinancial.com and provide the following information:

- * To verify your authorization to submit a request on behalf of an Oregon resident, please attach a copy of one or more of the following to your Request email:
 - Proof of guardianship, conservatorship, or other protective arrangement, or
 - Power of attorney for the consumer.
- * To verify your identity, please attach copies of the following to your Request email:
 - valid government-issued ID (not expired); and
 - a utility bill or similar documentation to verify your name and address.

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 the personal information relates to you. We will only use personal information provided in a Request to verify the requestor's identity or authority to make the Request.

We do not charge a fee to process or respond to your Request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the Request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your Request.

3) Response Timing and Delivery Method: We will acknowledge receipt of a Request within 10 business days of its receipt. We will respond to a Request within 45 days of its receipt. If we require more time (up to 45 additional days for a total of 90 days from receipt of the Request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, depending on whether or not you include your email with the Request submission. Responses to any Request that we provide will also explain the reasons we cannot comply with a Request, if applicable.

We may deny your Request if we are unable to verify your identity or have reason to believe that the Request is fraudulent. We may also deny your Request if the personal information

is subject to an exemption under the FCRA, the GLBA or the DPPA.

If your Request is denied, we will notify you and provide you with instructions on how to appeal the decision. Thereafter, you will have 10 days to appeal the first decision. If you appeal, we will issue you a final response within 45 days after receiving your appeal. If your appeal is denied, you will receive an explanation and additional information on how to contact the Oregon Attorney General's office to submit a complaint.

RETENTION AND SECURITY OF YOUR PERSONAL INFORMATION

- A) Necessary Duration. The length of time we retain your personal information depends on several factors. We retain your personal information throughout our relationship with you and for additional time as required by applicable laws and regulations or for other legal purposes, such as preparing for and defending against litigation.
- B) Security. We take the privacy and security of your personal information seriously. We maintain administrative, technical, and physical safeguards designed to protect your personal information's security, confidentiality, and integrity.

HOW TO CONTACT US

- A) Reach Out To Us. If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your rights regarding such use, or wish to exercise your rights under State Privacy Law, please do not hesitate to contact us by:

Privacy Support E-Mail:	CAprivacy@populusfinancial.com
Toll-Free Number:	800-224-4338
Postal Address:	Populus Financial Group, Inc. d/b/a ACE Cash Express Attn: Compliance 300 E John Carpenter Freeway, Suite 900 Irving, TX 75062