

Internet Privacy Statement

Wholesale Capital Corporation ("WCC") is committed to protecting the privacy of our customers' and potential customers' personal and financial information, including non-public personal information. This Internet Privacy Statement provides our customers ("you") with basic information relating to the types of information we collect, how we use the non-public personal information we collect, how we disclose the non-public personal information we collect, and how we safeguard the non-public personal information we collect. From time to time, we will update this Privacy Statement to reflect changes in our policies and practices.

Agreement to Internet Privacy Statement

By viewing this WCC website, you consent to this Internet Privacy Statement which includes your consent to disclose and use information about you in the manner detailed in this Statement. Other privacy policies may also apply in addition to the terms of this Internet Privacy Statement, including but not limited to our Privacy Policy. **IF YOU DO NOT AGREE WITH THIS STATEMENT, PLEASE DO NOT USE THIS WEBSITE.**

Our Collection of Non-public Personal Information

Non-public personal information consists of:

- Any information you provide to us to obtain a financial product or service, including your name, address, income, social security number, or other information on an application;
- Any information about an individual resulting from a transaction involving our financial products or services (eg. the fact that you are our consumer or customer, account numbers, payment history, or loan balances); or
- Any information obtained about an individual in connection with providing a financial product or service (eg. information from court records or a consumer report).

Non-public personal information does not include information that is "publicly available". Information is publicly available if we have a reasonable belief that the information is lawfully made available to the general public from government records, widely distributed media, or legally required disclosures in the public domain (eg. information in a telephone book or publicly recorded documents such as a mortgage).

WCC will not collect non-public personal information about you when you visit our website unless you have chosen to voluntarily provide such information to us.

We collect, retain, and use your information only when and to the extent we believe the information would be useful (and allowed by law) to administer our business and provide products, services, and other opportunities to our customers. In order to provide the products and services WCC offers, we will need to obtain certain non-public personal information from you. We collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us; and
- Information we receive from consumer reporting agencies ("credit bureaus") or other outside sources regarding verification of information provided by the consumer or from which the consumer has expressly given us permission to obtain information.

We only use non-public personal information collected to handle your request for specific services. We do not collect information about customers from third parties without a valid reason. In some cases, we gather information to comply with laws and regulations governing our industry.

We also use some of the data we collect to maintain the security of customer account(s) and to protect the privacy of the financial information.

E-Mail

We collect your e-mail address if you provide it to us in an online product application or you otherwise choose to send us by e-mail. We will only use your e-mail address to communicate with you directly for the purpose of meeting your request or for contacting you directly. This information is not disclosed to third parties.

When you send us an e-mail, we may retain your message and our response for quality assurance purposes. It is important to remember that regular (non-encrypted) e-mail is not secure. Please do not send us personal or account information via e-mail. If you need to communicate sensitive information of this nature to us, please contact our Customer Care Department at (800)683-4481.

Online Applications

We collect information from you when you fill out an online application for a new loan. This information may include, but is not limited to, your name, address, social security number, account numbers and date of birth. All online applications are encrypted to maintain the security of your information.

Planning Tools and Calculators

Information that you input on the website while using any of our planning tools and calculators is not captured, stored or used in any way other than to provide you with the information you're looking for at the time you use the tool or calculator. These calculators were built only for the purpose of helping you understand your financial options, enabling you to explore various scenarios and "what if" calculations for items like loan payments, retirement and education planning.

Our Collection of Anonymous Information

WCC may collect anonymous information about users who visit our site and aggregate the anonymous information for statistical analysis. For example, we may use it to determine usage patterns so we know which parts of our site are most popular. Examples of the type of anonymous information we collect and how we collect it include:

Internet Tags: provide information about your browser (e.g., Microsoft Internet Explorer, Netscape Navigator), operating system (e.g., Windows, Macintosh), Internet service provider (e.g., Microsoft Internet Explorer, Google Chrome, Mozilla Firefox) and similar information.

IP Addresses: a number assigned to your computer by a Web server when you are on the Internet; we might use IP address information to determine the number of users who have visited a specific area of our website. Please note we could use this information to identify you if necessary to comply with legal requirements or for security issues.

Credit Bureau Reports

WCC uses credit bureau reports in order to evaluate our customers' credit worthiness and to protect our customers from fraudulent conduct. Therefore, we may obtain a credit bureau report about you when you apply for or obtain any financial products and services from us, including the making or servicing of your mortgage loan. This report contains information pertaining to your credit history. This information will only be used for such purposes.

In accordance with the Fair Credit Reporting Act, WCC will share information regarding the status of your loan or other accounts with the credit bureaus. Pursuant to the Act, you have the right to ensure that the content of your credit report is accurate. If you believe that we have sent inaccurate information to the credit bureaus, please contact our Customer Care department at (800) 683-4481.

Limiting Employee Access to Information

We restrict access to your non-public personal information to only those authorized employees who need to know that information to provide products or services to our customers. Our employees are regularly educated so that they understand the importance of confidentiality and customer privacy.

Sharing of Personal Information

We do not disclose non-public personal information about our customers or our former customers to anyone, except as permitted by law or as otherwise disclosed in this Privacy Statement.

We will disclose non-public personal information about you to non-affiliated third parties in response to a court order or other lawful request by a government or regulatory agency, to protect against misuse or unauthorized use of our site, to limit our legal liability, to enforce or apply our rights and agreements or as otherwise permitted by law. We may also disclose non-public personal information to credit bureaus and similar organizations, and may exchange personal information with reference sources and clearinghouse services for purposes of fraud protection and credit reporting and verification. In addition, we may transfer your non-public personal information in the event of a change of control of our company, or a transfer of the business assets to which your non-public personal information relates.

We will not sell or distribute any non-public personal information about you to a third party in any circumstances other than those listed above.

Third Party Practices

We are not responsible for the privacy practices of any third parties or their websites which may differ from this Privacy Statement. We encourage you to review the privacy statement of each and every site that collects information from you in order to be informed of their privacy and security practices.

Security

We are committed to the security of our customer's financial and personal information. All of our operational and data processing systems are in a secure environment that protects account information from being access by third parties. We maintain and grant access to customer information only in accordance with our internal standards. With respect to information transmitted over the internet, we strive to keep your information secure and safeguard it from unauthorized access by using "Secure Socket Layer" encryption, firewalls to protect our servers,

and virus/intrusion detection software. However, no transmission over the internet can be guaranteed to be 100% secured, so you provide your information at your own risk.

Updating Your Personal Information

In order to maintain accurate information about our customers, we ask that you update your personal information when any changes take place. Please notify us if you change your address or telephone number by contacting our Customer Care department at (800) 683-4481.

Respecting the Privacy of Children

In accordance with the Children's Online Privacy Protection Act, WCC does not knowingly solicit names or personal information from children under the age of thirteen (13). We are committed to respecting the privacy of children online and recognize that this responsibility rests with both the online industry and with parents.

Promotional Materials That You May Receive

In order to advise you of special offers provided by us, we may send our customers promotional materials concerning financial products and services.

Contacting Us and Opting-Out of Communications

If you should have any questions about this Privacy Statement or wish to opt-out from further communications, please contact our Customer Care department at (800) 683-4481 or email us at info@wccloans.com.

This Privacy Policy was last updated on June 1, 2017.