GradBridge Privacy Policy

Effective Date: June 24, 2025

GradBridge, Inc. ("GradBridge," "we," "our," or "us") values your trust and is committed to protecting your privacy. This Privacy Policy explains how we collect, use, share, and protect your information when you visit our website, use our services, or are referred to us by a partner institution. It also explains your choices regarding the collection and use of your data. Please see the **U.S. Consumer Privacy Notice** for additional information on affiliate information sharing.

This Privacy Policy applies to all users of GradBridge's website and services, including referred leads from third-party lenders, and any data collected through partner platforms.

1. Information we collect the following types of information:

- a. Applicant and Co-Signer Personal Information:
 - Full name, address, phone number, email address
 - Government-issued identifiers or other identity, citizenship or residency verification information
 - Social Security Number (SSN) or other tax identification
 - Date of birth and demographic data
 - School enrollment and graduation information
 - Financial information including income, bank account details, and credit profile
- b. Application & Loan Information:
 - Information provided via applications for loan referrals or services
 - Credit scores, adverse action reasons, and loan decisions, when permitted by partners
- c. Automatically Collected Information:
 - IP addresses, device data, browser type
 - Usage data and cookies
- d. Information from Third Parties:
 - Information received from referral partners, credit bureaus, or other service providers
 - Information from publicly available information, including social media

2. We use your personal information to:

- Process and manage loan referral applications
- Conduct credit evaluations and underwriting using licensed and/or partner models

- Communicate with you regarding your application or account
- Fulfill legal and regulatory obligations, including investigating and protecting against fraudulent or illegal activities
- Improve our services and user experience
- Send you emails about relevant financial products and services

We may anonymize your personal information and use it for any purpose, such as data trends and aggregated data analysis.

3. We may share your information as follows:

- a. With Service Providers: We engage vendors and contractors to support our services, including data hosting, compliance support, analytics, and application processing. All vendors are contractually bound to use your personal information for the sole purpose of fulfilling the terms of our agreement, to comply with law, and maintain confidentiality and security of all shared information.
- b. With Referral and Lending Partners: Application data and credit decisions may be shared with referral and lending partners for underwriting and performance review, depending on your referral source.
- c. With Sponsor Banks: Necessary information is shared with our sponsor banks to comply with regulatory requirements and facilitate financial services.
- d. For Legal and Regulatory Compliance: We may disclose your information to prevent fraud or comply with applicable laws, regulations, legal processes, or government requests.
- e. In Corporate Transactions: Your information may be shared or transferred in connection with a business merger, acquisition, sale, financing, or similar corporate event.
- f. With Schools: We may share Loan Application Information and related information with your school for the purposes of approving or otherwise processing a loan application and administering the loan account.
- g. With Co-Signers: If two applicants apply for a loan together as student borrower and co-signer, each applicant will have access to the other's Loan Application Information.
- h. If Required By Law to (i) respond to valid requests by public authorities including for national security or law enforcement, (ii) respond to any legal process served on GradBridge or applicable lenders, or (iii) protect the rights, property, or safety of GradBridge or any affiliated entities.

i. With Your Consent

4. Data Retention and Security:

We retain your information for as long as necessary to fulfill the purposes for which it was collected, including to meet legal, regulatory, and reporting obligations. We use appropriate administrative, technical, and physical security measures—such as encryption, access controls, and secure servers—to protect your data from unauthorized access or disclosure, but do not guarantee or otherwise warrant that any security protections will protect against any potential security vulnerabilities.

5. Your Privacy Choices:

- Access, update, or correct your personal information.
- Opt out of marketing communications, such as following the instructions in any commercial email to unsubscribe. Please note that we may continue to send non-commercial email communications in order to service your account.
- Request deletion of your personal data, subject to legal or regulatory retention requirements
- Withdraw consent where applicable

Use the 'Contact Us' information below to exercise your privacy choices.

6. Use of Cookies and Tracking Technologies:

We use cookies and similar tracking technologies to enhance your experience, analyze site usage, and deliver relevant content. You can manage cookie preferences through your browser settings.

7. Children's Privacy:

Our services are not directed to children under the age of 13, and we do not knowingly collect personal information from children. If we become aware of such data collection, we will delete it promptly.

8. Changes to This Privacy Policy:

We may update this Privacy Policy periodically to reflect changes in our practices, technology, or legal requirements. Material changes will be communicated to you as required by applicable law.

9. Contact Us:

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at:

GradBridge, Inc.

800 North King Street Suite 304 3596 ilmington, DE 19801 Email: <u>Privacy@gradbridge.com</u>