

Curucredit.com Privacy Policy was last updated on **November \_\_\_\_ 2016**.

This Privacy Statement applies to transactions that occur on the CuruCredit.com website ("Curu") and any information shared with designated third party service providers ("Service Providers").

At Curu, we value the trust you have placed in us by using our service to conduct your transactions online. Because this involves a financial relationship, the protection of your privacy is of the utmost importance to us. We will take all reasonable protective measures in safekeeping your private information. It is Curu's policy to maintain confidentiality of your personal information. Visit this page often to ensure you are aware of our current policy as this policy may be changed, modified or amended at any time. Curu will attempt to provide 30 days notice of any changes, modifications or additions.

### **How does Curu safeguard your personal information?**

- Once your information reaches us, it resides on a server that is heavily protected. We maintain physical, electronic, and procedural safeguards on your information. While no method is 100% secure, we are committed to protecting the personal information that we collect.
- No data is stored on the user's electronic device. The system is communicating between third party services.
- Curu will use a secure server through AWS and will not use any open source CMS.
- No credit card or debit card data will be saved on the server.
- Only authorized employees are permitted to access customer information. Authorized employees have been trained on how to handle information properly and are subject to strict limitations and guidelines in the handling of that information. Only a small number of authorized employees are permitted to access customer bank account/credit card numbers and other personal financial data.

### **What personal information do we collect?**

- When you open an account with Curu, linked bank accounts are accessed through Yodlee Bank Aggregation API and analyzed to find the ideal actions to improve your credit score. Payments are underwritten by ACTUM and processed by National Cash Management Services. And we do require certain information, such as your name, address, phone number, and email address.
- **We also capture the Internet Protocol (IP) address used to connect your computer** to the Internet. This is retained and used only in the event that there are issues relating to the origin of a payment transaction.
- When you send, receive or request a payment through Curu, we collect transaction information needed to perform the service, which may include your credit card, debit card, or banking information.

- When we cannot verify the information you provide online, we may ask you to send us additional information or a verification letter from your bank. This verification process is necessary in order to safeguard your account and other customers against potential fraud.

### **To what parties do we disclose personal information?**

- Payments will be underwritten by ACTUM and processed by National Cash Management System.
- Agencies or authorities with whom we are legally required to cooperate. We may disclose information during the investigation of fraud or illegal activity. For example, we may disclose personal information in response to a subpoena, warrant, court order, or comparable legal process pursuant to Maryland and federal law.
- We do not sell, rent or trade any of the information we receive from you for any purpose to other companies.

### **What are your privacy choices?**

- You have the ability to view and update your personal information and credit card or checking account information any time by logging in to your Curu account.
- You have the choice of closing your Curu account. If you choose to close your account, we will mark your account in our database as closed but will keep your personal information in our database. Your information will be used only for fraud prevention, to assist law enforcement, or as permitted by law.
- You have the ability to review the Curu Privacy Policy anytime by clicking the Privacy link on the Curu website.
- If you have any other questions about Curu's privacy practices, please click the 'Contact Us' link on this website.

### **What should you do in case of errors or questions about your electronic transfers?**

A record of all your transactions is available online in your Account History, and we encourage you to review this log regularly. If you think your Account History or a transaction receipt is incorrect, or if you need more information about a transfer listed on the Account History or receipt, contact us as soon as you can.

If you contact us to report a possible error or question:

1. Tell us your name and email address.
2. Describe the error or the transfer you are unsure about, and explain why you believe it is an error and/or why you are requesting more information.
3. Tell us the amount, payee and date of the suspected error.

If you initially inform us verbally that there is an error, we may require that you send us your complaint or question in writing **within 10 business days**.

We will determine whether an error occurred **within 10 business days** after we hear from you and will correct any error promptly. If we need more time, however, **we may take up to 45 days** to investigate your complaint or question. If we decide to do this, we will provisionally credit your account **within 10 business days** for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation. If we ask you to put your complaint or question in writing and we do not receive the written complaint within 10 business days, we may not credit your account. For errors involving new accounts, **point-of-sale**, or foreign-initiated transactions, we may take up to **90 days** to investigate your complaint or question. For new accounts, we may take up to **20 business days** to credit your account for the amount you think is in error.

We will inform you of the results within three business days after completing our investigation. If we decide that there was no error, we will send you a written explanation. You may ask for copies of the documents that we used in our investigation **but not our specific work product, legal or otherwise**. All communications to you about the investigation will be through email or telephone, except in unusual circumstances at our sole discretion.

In case of errors or questions about your electronic transactions, or other claims, **you can email using the "Contact Us" link on our website, or write us at: Curu, Inc. 4500 College Avenue, College Park, MD 20740. We must hear from you no later than 60 days after we sent the first receipt or notice of your complaint/dispute.**