STATE SPECIFIC EMPLOYEE PRIVACY POLICY AND NOTICE AT COLLECTION

Last Update: July 9, 2024; Effective Date: July 9, 2024

State privacy laws grant residents certain privacy rights in their personal information. If you are a resident of California, Virginia, Colorado, Connecticut, Utah, Montana, Florida, Texas, and Oregon ("consumers" or "you"), this policy applies to you. This policy explains what personal information Sezzle Inc. ("Company," "we," "us," or "our") collects about you, how we use that information, and how we disclose that information. This policy applies to employees, applicants, owners, directors, officers, contractors of Sezzle, and if applicable, to those individuals' emergency contacts and beneficiaries who are residents of the foregoing states.

Personal Information

Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household ("Personal Information").

Personal Information does not include:

- Deidentified or aggregated consumer information.
- Publicly available information.
- Information covered by the following laws:

i. Medical or health information covered by the Health Insurance and Portability and Accountability Act of 1966 ("HIPAA") and the California Confidentiality of Medical Information Act ("CMIA") or clinical trial data.

ii. Personal information covered by certain sector-specific privacy laws such as the Fair Credit Reporting Act ("FCRA"), the Gramm-Leach-Bliley Act ("GLBA"), or California Financial Information Privacy Act ("FIPA") and the Driver's Privacy Protection Act of 1994.

Personal Information We Collect

The following chart details which categories of Personal Information we collect:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Other Personal Information	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected Classification	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, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or Network Activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation Data	Physical location or movements.	YES
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information	YES
I. Professional or Employment-Related Information	Current or past job history or performance evaluations.	YES

J. Non-Public Education Information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	YES
L. Sensitive Personal Information	Social Security numbers (SSNs), Driver's license, financial account or card numbers, precise geolocation, racial and ethnic characteristics, religious and philosophical beliefs, contents of mail, email and text messages, and biometric data.	YES

HOW WE OBTAIN PERSONAL INFORMATION

Directly from you

You enter or provide us with information in person, online, by email, by phone, by document upload. For example, when you apply for a job or update your information on file.

Directly and indirectly from you based on activity on our website or network

For example, from internet browsing or network usage details collected automatically.

From vendors that interact with us in connection with your employment position

For example, credit reporting agencies from which we check your credit in connection with a submitted employment application, vendors that provide background search results.

PURPOSES FOR WHICH WE COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION

- Plan and manage workforce activities and personnel generally, including for recruitment, including confirming eligibility for employment, background and related checks, employee onboarding, appropriate staffing, performance management, training and career development, payments and benefit administration, employee training, leaves and promotions;

- Conduct workforce assessments, including determining physical or mental fitness for work and evaluating work performance;

- Process payroll, manage wages and other awards such as stock options, stock grants and bonuses, reimburse expenses, and provide healthcare, pensions, savings plans and other benefits, reimburse expenses;

- Operate, maintain, monitor, and secure our facilities, equipment, systems, networks, applications, and infrastructure;

- Manage attendance, time keeping, leaves of absence, and vacation;

- Facilitate employee communication and workforce travel;

- Undertake quality and safety assurance measures, protect the health and safety of our workforce and others, and conduct risk and security control and monitoring;

- Conduct research, analytics, and data analysis, such as to assist in succession planning and to ensure business continuity, as well as to design and implement employee retention programs, diversity, equity, and inclusion initiatives;

- Perform identity verification, accounting, budgeting, audit, and other internal functions, such as internal investigations, disciplinary matters, and handling grievances and terminations;

- Operate and manage IT and communications systems and facilities, allocate Company assets and human resources, and undertake strategic planning and project management; and

- Comply with law, legal process, requests from governmental or regulatory authorities, internal policies, and other requirements, such as income tax deductions, recordkeeping, work permit and immigration regulations and reporting obligations, and the exercise or defense of legal claims.

- To manage licenses, permits and authorizations applicable to Sezzle's operations.

HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Core Business Vendors: We disclose Personal Information purposes related to our business operations, providing your benefits, and ensuring the safety, security and integrity of our business, infrastructure, and the individuals with whom we interact. As such, we may disclose your information to perform services such as administering payroll, benefits, or plans. This may require that we share your information with vendors like Ultipro (also known as "UKG Pro"), or others such as those that provide background searches, recruiting, shipping, training, and calendar, email, and document management, as well as accountants, attorneys, insurers, or vendors we retain to assist us when necessary to accomplish any of the purposes noted above. Applicable categories of Personal Information include:

- Identifiers, Other Personal Information, Protected characteristics, Commercial Information, Biometric Information, Internet or Network Activity, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Non-Public Education Information, Inferences, Sensitive Personal Information.

Law Enforcement, Government Entities, and Regulatory Agencies: We disclose Personal Information in when disclosure is required by law, to comply with relevant laws and regulations, to defend or pursue our legal rights. We may also disclose information to protect the safety, property, or rights of the Company. Applicable categories of Personal Information include:

- Identifiers, Other Personal Information, Protected characteristics, Commercial Information, Biometric Information, Internet or Network Activity, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Non-Public Education Information, Inferences, Sensitive Personal Information.

For Business Transfers: We may disclose Personal Information to a third party in the context of any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). Applicable categories of Personal Information include:

- Identifiers, Other Personal Information, Protected characteristics, Commercial Information, Biometric Information, Internet or Network Activity, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Non-Public Education Information, Inferences, Sensitive Personal Information.

We do not sell Personal Information of covered individuals, and we do not “share” or otherwise process Personal Information of covered individuals for purposes of cross-context behavioral or targeted advertising.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

We retain Personal Information including, without limitation, Sensitive Personal Information, for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The duration of your employment;
- The length of time we have an ongoing relationship with you or your dependents or beneficiaries and the length of time thereafter during which we may have a legitimate need to reference your Personal Information, such as to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws may require us to keep your employment records for a certain period of time); and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

YOUR PRIVACY RIGHTS

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 (“Request to Know”). Once we receive and verify your Request to Know, we will disclose to you either:

- Categories of Personal Information Collected, Disclosed, Sold, and/or Shared
    - The categories of personal information we collected about you.
    - The categories of sources for the personal information we collected about you.
    - Our business or commercial purpose for collecting that personal information.
    - The categories of third parties with whom we share that personal information.
    - If we disclosed your personal information to third parties, the corresponding categories of personal information.
    - If we sold or shared your personal information for cross-contextual behavioral advertising, the categories of personal information sold or shared.
- Specific Information
    - The specific pieces of personal information we collected about you.
- Specific Third Parties

Right to Delete

You have the right to request that we delete your personal information ("Request to Delete"). Once we receive and verify your Request to Delete, we will delete your personal information from our records, unless an exemption or exception applies.

Right to Correct

You have the right to request that we correct your inaccurate personal information ("Request to Correct"). Once we receive and verify your Request to Correct, we will use commercially reasonable efforts to correct your inaccurate personal information in our records.

Right to Limit the Use of Sensitive Personal Information

You have the right to direct a business that collects your sensitive Personal Information to limit its use to uses which are necessary to perform the services or provide the goods reasonably expected. However, we only use Sensitive Personal Information to provide the goods and services (i.e. employment) requested by you; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for such actions; to ensure people's physical safety; to perform services on our behalf; to verify or maintain the quality or safety of our products, services, and devices.

Right to Opt Out Of Profiling Or The Use Of Automated Decision Making Technology

You have the right to opt-out of the use of automated decision-making technology or profiling applies to its use in making decisions about the consumer's work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. We do not use Personal Information in that way and without human intervention.

Right to Withdraw Consent

Subject to exemptions, where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described below.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights, nor will we retaliate against you.

HOW TO SUBMIT PROVACY REQUEST

How to Submit a Request

To make a Request to Know, Request to Delete, Request to Correct, or Withdraw Consent as described above, please submit a verifiable consumer request to us by one of the following methods:

- By using our online Data Request Form

- By phone: 1 (888) 540-1867

Please clearly state what information you are requesting, your relationship with Sezzle, and any other requests you are making.

Requests by Authorized Agents

If an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted above. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described above or confirm that you provided the agent permission to submit the request.

1. To verify the authority of an authorized agent, we will need one or more of the following:

- written permission from the person who is the subject of the request, or
- power of attorney

2. To verify the identity of an authorized agent, we will need the following:

- Valid Government Issued ID (not expired) and
- a Utility Bill, Bank Statement, or similar documentation to verify the agent's name and address.

RIGHT TO APPEAL

In certain cases, you have the right to appeal if we deny your privacy request. Please contact privacy@sezzle.com if you wish to appeal. We will consider your request and applicable law and notify you of our decision.

CHANGES TO THIS EMPLOYEE PRIVACY POLICY

We reserve the right to change this Employee Privacy Policy at any time without prior notice. If we update this Employee Privacy Policy, we will notify you by posting a new version on this page. Please check here regularly to learn of any changes. We will post the date of the most recent Employee Privacy Policy at the top of this page.

CONTACT US

If you have any questions or comments about this Employee Privacy Policy, the ways in which Sezzle collects and uses your Personal Information, your choices, and rights regarding such use, or wish to exercise your rights under law, please do not hesitate to contact us at:

Email: privacy@sezzle.com

Postal Address:

Sezzle Inc.

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