



ON THE ROAD LENDING & OTR FUND I, LLC
NOTICE ON OUR POLICIES REGARDING:

PROTECTION OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

Personally-identifiable information (PII) is data which can be used to identify, locate or contact an individual and includes information like name, date of birth, place of residence, credit card information, phone number, race, gender, criminal record, age, and medical records. Every organization stores and uses PII, be it information on their employees or customers. PII is very desirable to criminals who can commit identity theft and sell this information on the black market.

PII Gathered by OTR:

In the process of working with you, OTR collects PII on you, including -

Name

Date of Birth

Address and Phone Number

Social Security Number

Driver's License or Passport Number

Race

Gender

Credit Information

Bank Account Information

Storage and States of PII Data:

Data in Use: You provide information to OTR for the services we provide to you including financial coaching and extending you credit. This information is transmitted by you to us via our secure online portal and is actively used by your coach and our underwriting team in evaluating your loan request.

Data at Rest: The information you upload through the portal gets stored in our secure cloud-based Customer Relationship Management database and, once you get your loan, it is also stored in our secure cloud-based loan servicing platform.

Data in Motion: For some clients who have discomfort with technology, data may be transmitted by email or through the US postal service before being uploaded to our cloud-based systems.

Sensitivity Classification of PII

We classify your data based on sensitivity to prioritize how best to protect it.

1. If a single record can identify an individual by itself, it is considered **highly sensitive** and access to this data should be restricted to “need to know” only individuals. Your driver’s license would be an example of this type of data. This information is stored in your record in our secure database. This file is also password-protected within the secure system. Only employees who are preparing and reviewing your credit file have access.
2. If two or more pieces of data combined can identify an individual, it is deemed **sensitive** and should be considered private and accessible to people who need it in their daily jobs. This might include your social security number being partially-redacted in one location and partially-redacted in another such that the entire number would be obtainable if both locations were available. In our system, your social security number is encrypted so that none of our employees see it. The full number is only visible to the underwriter who pulls your credit report. The coach who reviews it with you only sees a portion of the number.
3. **Non-sensitive**, low-risk data could be considered public with little or no access restrictions in place. We do not believe any information gathered from our clients falls into this category. All information is treated with either highly sensitive or sensitive classifications.

Deletion of Old PII No Longer Needed

Because our lending activity requires current information, we do not keep copies of your highly-sensitive information for more than six months. Our system is designed to purge your driver’s license or passport after six months, whether you are in a car loan or not. This information will also be purged from backup storage systems.

Copies of credit reports, which might identify an individual if it were matched to the encrypted social security number in our database, should our system be breached, will also be deleted within six months of input.

All other information will be maintained in our system with routine password changes in the event that you reapply.

Any paper documents which include your PII will be shredded.

Paper copies of loan documents are maintained in a locked file cabinet in a locked file room, accessible only by the Vice President of Finance and the CEO.

Acceptable Usage Policy

For clients working with OTR before obtaining a loan, your PII is used to evaluate your loan application file and to provide you with financial coaching and advocacy, such as the creation of a budget.

Your email address is retained in our system for ongoing communications from us. However, you may opt out of this system at your discretion at any time to cease receiving emails or text messages. Moreover, we do not sell this information or provide access to our database to anyone outside of our company.

For clients who obtain a vehicle loan through OTR, current contact information is a requirement of your loan. We must maintain addresses, phone numbers and email addresses for you, which are current at all times, so that we may contact you regarding the status of your loan. This information is kept in our secure loan servicing database and only employees involved in portfolio management or oversight of this function are authorized to review it. Each person who has access to this system has their own secure password, which is routinely changed.

Encryption of PII at Rest and In Transit

We do not send unencrypted information by email. Any secure communications with sensitive or highly sensitive data is sent via an encrypted file.

Elimination of Permission Errors

Our employees are governed by the principal of least privilege, meaning they are only granted access to the data they need to do their jobs. Our databases provide for establishment of permission sets whereby certain data is restricted to certain job functions.

Employee Education Policy on PII

OTR has adopted a yearly training program for its employees to reinforce policies and procedures around the treatment of PII.

Standardized Procedure for Departing Employees

When an employee departs the company, their access to PII is deleted. Login credentials for all systems are changed or their accounts are disabled. Employees receive a copy of their signed confidentiality agreement and a legal reminder of their responsibilities around the protection of PII. OTR retains the right to take legal action against any employee who violates our PII policies.

Reporting Violations

OTR maintains a Whistleblower Policy whereby employees can notify senior management or the board of directors in the event of violations of this policy or other potentially harmful behavior.