

LEASEACCELERATOR PRIVACY POLICY

Last Updated – June 2017

LeaseAccelerator Services, LLC (“LAS”) and its sister company LeaseAccelerator Vendor Services, LLC (“LVS”, which are collectively referred to below as “we” or “us” and in the possessive “our”) are committed to protecting the privacy of persons who visit our websites (“Visitors”), whether as customers or personnel of customers who are registered to use our Services (“Users”) or visitors who register for additional information or to attend our presentations (“Registrants”). This Privacy Policy describes how we collect, use and disclose information about Visitors and their use of our websites <https://leaseaccelerator.com/> and subdomains (our “Website”).

We respect the privacy of our Visitors. This Privacy Policy and the steps we take in compliance with its terms are driven by this respect for privacy. Each Visitor to our Website must respect the needs of all other Visitors by complying with our Privacy Policy. Please read this Privacy Policy carefully with this in mind.

This Privacy Policy is incorporated into and subject to the terms of our Terms of Use. These Terms of Use are also accessible from the home page of our Website <https://www.leaseaccelerator.com/>.

This Privacy Policy governs our conduct and the conduct of individuals we employ or manage. If a Visitor visits a website that we mention or link to, any information the User provides to that site will be governed by that site’s privacy policy.

LAS and LVS provides various commercial lease management, sourcing and accounting services to lessees, lessors and vendors (the “Services”). LAS uses the Websites as a platform to assist lessees in managing their commercial lease portfolios and leased assets, to source equipment lease financing, and to account for lease transactions under applicable accounting standards.

LVS uses the Websites as a platform to assist lessors and vendors with lease finance programs to automate equipment finance and asset management tasks, processes, workflows, and reporting.

1) Information We Collect

Our primary goal in collecting information from Users is to facilitate the proper functioning of the services we offer through our Websites and to enable the internal use of software-as-a-service based lease applications and access to the Services.

(a) Registrant and User Information. For Registrants requesting additional information about the Services, or registering for an event, we require you to provide

us with personal contact information, such as name, company name, phone number, and email address

("Registrant Information"). To access and use applications on our Website, each User or an authorized agent of the User's employer ("Registrar") must register using our online registration form, where the User is required to provide us with user information consisting of the User's name and work e-mail address, and may also elect to provide business telephone numbers, business address, and employer-assigned employee number for the User.

(b) Transaction Information. Each commercial lease transaction managed, sourced (including requests for proposals, quotes and other bidding activities) or accounted for using the Services is called a "Transaction". Information regarding each Transaction ("Transaction Information") includes the operative lease terms (e.g. corporate name of lessor and lessee, start and end date, end of term options, conditions to funding, breach, remedies and notice provisions), payment terms (e.g. number and amount) and a description of the property that is the subject of the Transaction (e.g. property cost and where it is to be located). Because LAS and LVS only provide Services with respect to Transactions between businesses, Personal information included within Transaction Information is limited and may include the name, job title, email address, office address and phone number of individuals who are identified in the sourcing communications as contacts and in notice or contact provisions of or as signatories to the lease documentation as representatives of the lessee, lessor or other party to the Transaction. Users must also provide us with Transaction Information concerning Transactions initiated through our Website. Requests for proposals ("RFPs") by Users seeking lease financing ("RFP Authors") are available to multiple financing sources for bidding ("RFP Bidders"). RFP Bidders' proposal responses ("Proposals") are private among the RFP Author, the responsive RFP Bidder and us. Award terms are private among the RFP Author, the selected RFP Bidder (the "Selected Bidder") and us. Those RFP Bidders whose Proposals are rejected are notified of such rejection.

(c) Usage Information. We also automatically track, using different techniques, certain session information about Users based upon their behavior while on our Website. Such information may include the URL that the User just came from, which URL the User next goes to, what browser the User is using, and the User's IP address.

We do not collect or use, and Users must not to provide us, information that constitutes "sensitive personal information", including, for example, information specifying medical or health conditions, racial or ethnic origin, or trade union membership.

2) Our Use of Information We Collect from and about Users and Registrants

We limit the use of Registrant Information and User Information to administration of our Websites, to delivery of the requested Services to our Users and to communications with and marketing to Registered Users regarding their interest in our Services. The Usage Information we collect allows us to provide features that most likely meet our Users' needs, and to customize our Websites to make Users' experiences easier and quicker.

We use the information about Users that we capture to facilitate communications with stakeholders involved in the leasing process. We use User Information and Transaction Information to manage our business, verify the eligibility of Users for our Website, validate the authenticity of the User, monitor compliance with our Terms of Use, process User requests and Transactions, contact Users regarding their use of, changes to, or new services available on our Website, for billing purposes, and do internal research on our Users' demographics, interests, and behavior to better understand and serve our Users. We collect source IP addresses for all system activity in order to ensure audit trailing and to determine the source of any malicious use of the system. We use information about our Users to improve our content and product offerings and to customize our site's content, layout, and services. We believe these uses allow us to improve our Website and better tailor it to meet our Users' needs.

3) Our Disclosure of Information to Third Parties

Our policies regarding the sharing of User Information and Transaction Information are as follows:

- We may disclose User Information or Transaction Information to the companies with whom the User is employed or deals, directly or indirectly, in connection with a Transaction or other dealings using our Website.
- We may disclose User Information or Transaction Information to third parties we engage to facilitate our Services. In such instances, we obligate those third parties to conform to our privacy standards. Instances where this sharing of information may occur include the following illustrative (but not exclusive) examples:
 - We may share User Information and Transaction Information to allow potential RFP Authors to decide if a User should be sent an RFP or otherwise contacted to see if the User might be a potential RFP Bidder.
 - When a User elects to solicit, send out or respond to a RFP, we may share User Information and Transaction Information with the potential participants.
- Other than in the course of providing our Services as described above, we do not share personal data whether included in User Information or Transaction Information with third parties. If our business model changes in the future and we decide to use any personal information other than to provide our Services as

described above or we decide to share personal information with non-agent third parties, before such change in use or sharing, we will notify each individual whose personal information we have and give such person the choice to “opt-out” of such change in use or disclosure of such personal information.

In cases of onward transfer to third parties of data of EU and Swiss individuals received pursuant to the EU-US Privacy Shield and Swiss-US Privacy Shield (see Paragraph 14 below), we remain potentially liable.

We may occasionally aggregate our User Information or Transaction Information and disclose such information to third parties in aggregate form for a number of business purposes, including running and enhancing our Website. In these situations, we do not disclose any information that could be used to identify our Users.

We reserve the right to disclose or report information about our Users in limited circumstances where we believe in good faith that disclosure is required to protect our rights or the rights of our Users.

We may disclose User Information or Transaction Information as we reasonably believe the User has authorized us to do so.

We may be required to disclose an individual’s personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

We acknowledge the right of individuals to access their personal data to review, correct, or delete their information. Users can correct factual errors in the User’s personally identifiable information (name, e-mail address, etc.) by contacting the party who asked the User to register as a User or by sending an e-mail to: support@leaseaccelerator.com. To protect a User’s privacy and security, we will also take reasonable steps to verify the User’s identity before making corrections. Users requesting information regarding our Services may request our deletion of the Users contact information by sending an e-mail to: support@leaseaccelerator.com.

4) Disclosure by Users

The Website provides Users the opportunity to disclose their own information to other Users. Users are solely responsible for, and we have no control over and do not audit, such disclosures.

5) How We Use Cookies

We use cookies to assist us in securing a User’s transactions and to enhance the performance of our Website. We use a common technique, HTTP-header cookies, to identify one page request from another.

The cookies our Website creates do not contain any personal information. They merely allow us to recognize that a page request comes from someone who has already logged on. While a User's browser may allow the User to "reject" cookies, our Website requires that each User accept all cookies in order for the features and security mechanisms to function fully.

Cookies are stored on a User's hard drive, not on our Website. Cookies are "session cookies", meaning that they are automatically deleted at the end of a session, or are automatically "timed out" after a predefined period of inactivity. If a User navigates away from the Website applications, they are required to log in again to preserve the security of our Website services.

Learn how to use your browser to disable/block cookies [here](#).

6) How We Protect User Information and Transaction Information

We take security measures to help safeguard User Information and Transaction Information from unauthorized access. For example, our corporate policies provide that employees with access to confidential information about our Users may not use or disclose the information except for our business use.

We use encryption in the transmission of sensitive information between the User's system and ours. Any time a User enters information on our Website, we encrypt it using Secure Socket Layer (SSL) technology. SSL protects information as it crosses the Internet. To support this technology, Users need an SSL-capable browser. We recommend using the most recently released version of Chrome, Firefox, or Edge. These browsers will activate SSL automatically whenever a User signs on to our Website.

We want our Users to feel confident using our Website to transact business. However, due to the nature of the Internet, we cannot ensure that all of our Users' private communications and personally identifiable information will never be disclosed in ways not otherwise described in this Privacy Policy.

7) Q&A and Collaboration

The Website enables inter- and intra-company Q&A communication and collaboration communications directly between Users. Q&A communications are private between lender and borrower, syndicator or vendor. Collaboration communications are private within a User's organization and cannot be viewed by any third-party Users. Q&A communications between Users and collaboration communications between or among individuals within a User's organization are secure utilizing the same technology as described in Section 6, above. E-mail

communications between Users and between the Users and us are subject to the limitations of general Internet security.

8) Passwords and Logging Off

A User password is a private entry key into the User's workspace, i.e. "My RFPs" for borrowers, syndicators and vendors and "My RFPs & Proposals" for lenders. A User should never share his password with anyone and the User should change it periodically. A User will be required to change his password after repeated failed attempts. A User can change his password at any time by logging in to our Website and accessing the User's Profile. After a User has finished accessing the applications, the User must log off. This prevents someone else from accessing User Information and Transaction Information if the User leaves his computer unattended.

9) Changes to User Information and Transaction Information

Users have access to and the ability to update their contact information within LeaseAccelerator. If a User has a concern about his User Information, or wants to correct, update, or confirm such information, the User should log in to our Website and view and/or change such information. For instructions on how to make such changes, please refer to our "Help" menu.

10) Inadvertent Disclosure of Confidential Information

In the event that a User receives information which the User knows was not intended to be disclosed to the User, our Privacy Policy requires that the User advise us by email of the disclosure and request instruction on what to do. We will contact the disclosing person and get direction of what should be done with the disclosed information.

We may request that a User delete or otherwise destroy the information or take action to return the information to the disclosing User. Each User agrees to comply with such requests.

11) No Attempt to Access Restricted Information

Each User agrees that he will not and will not assist any other person in attempting to access information it is not authorized to see. Each User agrees not to disclose to third parties the User's password. Each User agrees not to attempt to circumvent any of our security measures.

12) Not a Consumer Website; Consumer Information Must Not be Provided

Our Website is intended for business/commercial use only. Our Website is not intended for consumer use. Each User agrees not to use our Website to provide or store any consumer information, including without limitation, social security numbers, credit card numbers or individual bank account information. Each User agrees not to disclose personal information, other than as described in Section 1(a) and its employer assigned identifying information (e.g. employee number), about any individual when using our Website.

13) Changes to this Privacy Policy

We will occasionally update this privacy policy. We will change the “Last Updated” date at the top of this privacy policy when we make those changes. If we make a material change in the way we collect, use and/or share User Information or Transaction Information, we will notify our Users by sending an email to the email address we have for the User and/or posting a notice on our Website.

14) Notice to European Union (“EU”) and Switzerland

Our operations primarily are located in the United States and Canada. EU and Swiss User information will be transferred out of the EU and Switzerland to the United States, India and Canada. By registering as a User, he or she consents to the storage and use as described in this Privacy Policy of any personally identifiable information provided us.

LeaseAccelerator Inc. complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. LeaseAccelerator Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the US-EU and Swiss-US Privacy Shield Principles, LeaseAccelerator Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact LeaseAccelerator Inc. at:

David McCullough
LeaseAccelerator
10740 Parkridge Blvd. Suite 701
Reston, VA 20190

LeaseAccelerator Inc. has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

Users can correct factual errors in the User's personally identifiable information (name, e-mail address, etc.) by contacting the party who asked the User to register as a User or by sending an e-mail to: support@leaseaccelerator.com.

To protect a User's privacy and security, we will also take reasonable steps to verify the User's identity before making corrections.

15) Regulatory Agency

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

16) Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us by email at legal@leaseaccelerator.com or by telephone at 1-866-446-0980.