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## Solara Holdings, LLC and Affiliates Privacy Policy

### I. Our Commitment to Your Privacy

Solara Holdings, LLC and its affiliated companies (collectively, "**Solara**," "**we**," "**us**," or "**our**") understand that your privacy is a fundamental right. As a financial institution, we are committed to protecting the **confidentiality and security** of the Nonpublic Personal Information (NPI) we collect from and about you.

This Privacy Policy describes how we collect, use, and share information, and explains the choices you have regarding this sharing, in compliance with federal laws, including the **Gramm-Leach-Bliley Act (GLBA)**, and other applicable state laws, such as the **California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA)**.

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### II. Definitions

Term	Definition
<b>Consumer</b>	An individual who obtains or has obtained a financial product or service from us that is to be used primarily for personal, family, or household purposes.
<b>Customer</b>	A consumer with whom we have an ongoing relationship (e.g., an active account, loan, or investment). Customers receive the annual privacy notice.
<b>Nonpublic Personal Information (NPI)</b>	Personally identifiable financial information (PIFI) and any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using PIFI that is not publicly available. This includes, but is not limited to: <b>Social Security numbers, account balances, transaction history, and income.</b>

Term	Definition
Affiliates	Companies related by common ownership or control. They can be financial or non-financial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial or non-financial companies.

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### III. Information We Collect

We collect NPI about you from various sources, which may include:

- **From you directly:** Information you provide on applications, contracts, forms, or through communications (e.g., name, address, Social Security number, assets, employment history).
  - **From your transactions with us:** Information about your account balances, payment history, and parties to transactions.
  - **From nonaffiliated third parties:** Information we receive from parties related to a transaction (e.g., information necessary for processing a service request). **We do not collect credit history or creditworthiness information from third parties.**
  - **From our website/online services:** Information we collect from internet activity, such as cookies, IP addresses, and geolocation data.
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### IV. Information We Share

We may share your NPI with our affiliates and nonaffiliates in the following circumstances:

#### A. Sharing with Affiliates (Companies We Own or Control)

Why We Can Share	Do We Share?	Can You Limit This Sharing?
<b>For everyday business purposes</b> (processing transactions, maintaining accounts, responding to court orders and legal investigations).	<b>YES</b>	<b>NO</b> (Federal law allows this sharing.)
<b>For our affiliates' everyday business purposes</b> (information about your <b>transactions and experiences</b> ).	<b>YES</b>	<b>NO</b> (Federal law allows this sharing.)
<b>For our affiliates to market to you using other Nonpublic Personal Information (NPI)</b> (e.g., income data, assets, or other descriptive NPI not related to transactions/experiences).	<b>YES</b>	<b>YES</b> (You have the right to <b>Opt Out</b> of this sharing for marketing purposes.)

**B. Sharing with Nonaffiliates (Companies Not Related to Solara)**

Why We Can Share	Do We Share?	Can You Limit This Sharing?
<b>For everyday business purposes</b> (as permitted by law, such as processing transactions, fulfilling a product request, or fulfilling a service request).	<b>YES</b>	<b>NO</b> (Federal law permits this sharing without an opt-out.)
<b>For nonaffiliates to perform services for us or on our behalf</b> (e.g., service providers, joint marketers).	<b>YES</b>	<b>NO</b> (We have a contract that requires them to protect your NPI.)
<b>For nonaffiliates to market to you.</b>	<b>YES</b>	<b>YES</b> (You have the right to <b>Opt Out</b> under GLBA/Regulation P.)

Why We Can Share	Do We Share?	Can You Limit This Sharing?
For joint marketing with other financial companies.	YES	YES (You have the right to <b>Opt Out</b> under GLBA/Regulation P.)

**We do not share, and will not sell, your Nonpublic Personal Information to third parties for their own marketing purposes, outside of the exceptions listed above, without offering you the right to opt-out.**

## V. How to Limit Our Sharing (Opt-Out Rights)

If you are a consumer or customer of Solara Holdings, LLC, you have the right to limit the following types of sharing:

1. **Limiting Affiliates from using certain Nonpublic Personal Information (NPI)** (not related to transactions or experiences) to market to you.
2. **Limiting Nonaffiliates from using your NPI to market to you.**
3. **Limiting Sharing for Joint Marketing with other financial companies.**

To exercise your right to opt-out of these specific disclosures, please contact us by:

- **Calling us toll-free at:** 1-215-720-9846
- **Email us online at:** [privacy@solaraholdings.CO](mailto:privacy@solaraholdings.CO)
- **Mailing the enclosed Opt-Out Form to:** Solara Holdings, LLC, Attn: Privacy Compliance, 4275 County Line Road, Ste 20-117, Chalfont, PA 18914

**Your choice to limit sharing will apply to all consumers on your account and will remain in effect until you tell us to change it.** If you are a new customer, we can begin sharing your information **30 days** from the date we sent this notice.

## VI. Confidentiality and Security

We restrict access to your NPI to those employees who need to know that information to provide products or services to you. We maintain **physical, electronic, and procedural**

**safeguards** that comply with federal and state regulations to **guard your nonpublic personal information** from unauthorized access and use.

**Prohibition on Account Number Sharing:** We do not disclose consumer account numbers or access codes to any nonaffiliated third party for use in marketing.

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## VII. State-Specific Rights (e.g., CCPA/CPRA - California Residents)

If you are a California resident, the **CCPA/CPRA** grants you additional rights concerning your Personal Information (PI), which may overlap with or extend beyond your NPI.

<b>Your California Rights</b>	<b>Description</b>
<b>Right to Know</b>	You have the right to request the categories and specific pieces of PI we have collected about you, the sources, the purposes for collecting/selling/sharing it, and the categories of third parties to whom we disclose it.
<b>Right to Delete</b>	You have the right to request the deletion of PI we have collected about you, subject to certain exceptions.
<b>Right to Opt-Out of Sale/Sharing</b>	You have the right to direct us not to <b>sell or share</b> your PI (as those terms are defined under CCPA/CPRA). Solara respects Global Privacy Control (GPC) signals as a valid opt-out request.
<b>Right to Limit Use of Sensitive PI (SPI)</b>	You have the right to limit the use and disclosure of your sensitive personal information (including Social Security number and financial account info) for purposes other than those necessary to provide the financial services you requested.
<b>Right to Correct</b>	You have the right to request that we correct inaccurate PI that we maintain about you.

To exercise your California privacy rights, please contact us via:

- **Toll-Free Phone:** 1-215-720-9846

**Please Note:** Much of the information we collect is considered NPI and is protected under GLBA, which **may preempt** certain rights under CCPA/CPRA. We will process all requests in accordance with all applicable laws, prioritizing the requirements of GLBA where a conflict exists.

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### **VIII. Changes to This Privacy Policy**

We reserve the right to amend this Privacy Policy at any time. **If we make any material changes** regarding how we handle previously collected NPI, we will provide you with a **revised notice** and/or a new opt-out opportunity as required by law.

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### **IX. Contacting Us**

If you have questions about this Privacy Policy, please contact us at:

**Solara Holdings, LLC**

**4275 County Line Road, Ste 20-117, Chalfont, PA 18914**

**Phone: 1-215-720-9846**

**Email: [privacy@solaraholdings.CO](mailto:privacy@solaraholdings.CO)**

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## Opt-Out Notice Instructions

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If you prefer Solara Holdings, LLC and its affiliated companies **do not share** your NPI as described in the table below, you may exercise your opt-out rights by using **one** of the following methods:

1. **Email:** Send an email to **Privacy@solaraholdings.CO** with the subject line "**Privacy Opt-Out Request**" and include your **Name** and **Account Number(s)** in the body of the email.
2. **Phone:** Call us and follow the instructions:  
**1-215-720-9846**
3. **Mail:** Complete the form below and mail it to:

Solara Holdings, LLC, Attn: Privacy Compliance, 4275 County Line road, Ste 20-117, Chalfont, PA 18914

<b>Sharing You Can Limit</b>	<b>Do You Want to Opt-Out?</b>
<b>Affiliates:</b> Sharing Nonpublic Personal Information (NPI) with our affiliated companies for their use in marketing to you (e.g., sharing income or asset data).	<input type="checkbox"/> <b>YES, I want to limit this sharing.</b>
<b>Nonaffiliates:</b> Sharing NPI with nonaffiliated companies so they can market their products and services to you.	<input type="checkbox"/> <b>YES, I want to limit this sharing.</b>
<b>Joint Marketing:</b> Sharing NPI with other financial companies under a joint marketing agreement.	<input type="checkbox"/> <b>YES, I want to limit this sharing.</b>

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