

Privacy Policy

Effective Date: January 1, 2024

This website is owned and operated by Ibantek Payments, LLC (hereinafter "Ibantek") We at Ibantek respect and protect the privacy of visitors to our websites, and the privacy of our customers. We respect and value the privacy of our clients and have developed this Privacy Policy to demonstrate our commitment to protecting your privacy. This Privacy Policy applies to and describes our information handling practices when you access our services, which include our content located on this website, or any other websites, pages, features, or content we own or operate (collectively, the "Site(s)") or third-party applications relying on API, and related services (referred to collectively hereinafter as "Services").

These Sites are general audience websites and we do not knowingly collect personal, or other, information from children under the age of 18. If you are under the age of 18, please do not use our site. If we suspect that information provided to us is, in fact, personal information of an individual younger than 18 years of age, such information will be deleted, aggregated, or anonymized as soon as possible. Please notify us if you know of any individuals under the age of 18 using our services so we can take action to prevent access to our services.

1. Acceptance of terms of Privacy Policy

Ibantek is a small business marketplace to assist small businesses in accessing and managing capital. Our Privacy Policy applies to everyone who utilizes our Sites.

You agree to this Privacy Policy by accepting Ibantek's [Terms of Use](#), by accessing, browsing, or using our Sites. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. We may provide additional "just-in-time" disclosures or

information about the data processing practices of specific Services. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services

2. Types of Information that is collected

We collect several types of information about you and your business when you access our Sites.

Our Sites collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information"). Personal information does not include:

- **Publicly available information from government records.**
- **Deidentified or aggregated consumer information.** To establish an account and access our Services, we'll ask you to provide us with some important information about you. This information is either required by law (e.g. to verify your identity), necessary to provide the requested services (e.g. you will need to provide three (3) months of bank statements), or is relevant for certain specified purposes, described in greater detail below. As we add new features and Services, you may be asked to provide additional information.

Please note that we may not be able to serve you at all, or our Services may be degraded if you choose not to share certain information with us.

2.1 Information we collect directly from you

We collect information directly from you about you.

- **Personal Identification Information:** Full name, date of birth, demographic information (e.g. nationality, gender) signature, utility bills, photographs, phone number, home address, IP Address, social security number, and/or email.
- **Formal Identification Information:** Government issued identity document such as Passport, Driver's License, National Identity Card, State ID Card, Tax ID number, passport number, driver's license details, national identity card details, visa information, and/or any other information deemed necessary to comply with our legal obligations under financial, consumer protection, and commercial lending laws.
- **Institutional Information:** Employer Identification number (or comparable number issued by a government), proof of legal formation (e.g. Articles of Incorporation), personal identification information for all material beneficial owners.
- **Financial Information:** Bank account information, Tax return information, Federal and State Tax ID, Profit and Loss Statements, Income statements, Credit Score, Business Invoices, and Wire Instructions.
- **Transaction Information:** Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp.
- **Employment Information:** Office location, job title, and/or description of role.
- **Correspondence:** Survey responses, information provided to our support team or user research team.
- **Business Information:** Type of business, list of officers, members, or managers of the business, articles of incorporation, certificates of good standing, and ownership structure.

The documents and information collected are securely stored and safeguarded. To fulfill our service obligations to you, you provide your permission to share any and all information provided to or obtained by Ibantek on your behalf with lenders, with other businesses who may need this information to fulfill its services to Ibantek, for Ibantek's business purposes, or to fulfill regulatory or other legal requirements. Under no circumstances will we disclose, transmit, or share in any way, these

documents without your permission, unless being disclosed pursuant to legal and regulatory requirements which prohibit this notification.

2.2 Information we collect from you automatically

We collect information about your computer's interactions with our Sites for a variety of purposes.

We receive and store certain types of information automatically, such as whenever you interact with the Sites or use the Services. This information helps us address customer support issues, improve the performance of our Sites and applications, provide you with a streamlined and personalized experience, and protect your account from fraud by detecting unauthorized access. Information collected automatically includes:

- **Online Identifiers:** Geo location/tracking details, browser fingerprint, operating system, browser name and version, and/or device IP addresses.
- **Usage Data:** Authentication data, security questions, click-stream data, public social networking posts, and other data collected via cookies and similar technologies.

For example, we may automatically receive and record the following information on our server logs:

- **How you came to and use the Services;**
- **Device type and unique device identification numbers;**
- **Device event information** (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL);
- **How your device interacts with our Sites and Services, including pages accessed and links clicked;**
- **Geographic location;** and,
- **Other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser.**

We may also use identifiers to recognize you when you access our Sites via an external link, such as a link appearing on a third-party site.

2.3 Information collected from third parties

We may obtain the following types of information about you from third party sources.

From time to time, we may obtain information about you from third party sources as required or permitted by applicable law. These sources may include:

- **Public Databases & ID Verification Partners:** We obtain information about you from public databases and ID verification partners for purposes of verifying your identity in accordance with applicable law.
- **Credit Bureaus:** With your consent, we obtain information from credit bureaus, including your credit report. We will not disclose your credit report without your explicit permission. We obtain your credit information to better provide services to you, to match you with appropriate lenders, to ensure your identity, and to avoid fraud.
- **Financial Institution:** With your consent, we obtain information directly from your financial institution, including copies of your account statements. We obtain this information to assist in providing Services to you, including the underwriting process. To do this, we utilize Finicity, Oculous, and Plaid. Finicity's privacy policy, available at <https://www.finicity.com/privacy/> describes its collection and use of personal data. Oculous's privacy policy, available at <https://www.ocrolus.com/privacy-policy/>, describes its collection and use of personal data. Plaid's privacy policy, available at <https://plaid.com/legal/#consumers>, describes its collection and use of personal data
- **Joint Marketing Partners & Resellers:** For example, unless prohibited by applicable law, joint marketing partners or resellers may share information about you with us so that we can better understand which of our Services may be of interest to you.

- **Advertising Networks & Analytics Providers:** We work with these providers to provide us with de-identified information about how you found our Sites and how you interact with the Sites and Services. This information may be collected prior to account creation.
- **Third Party Service Providers:** Ibantek customers who use certain of our products are subject to third-party privacy policies, including WePay, whose privacy policy is maintained at <https://go.wepay.com/privacy-policy/>.

2.4 Data Anonymization and Data Aggregation

We may use data we have anonymized and aggregated for any business purpose.

Anonymization is a data processing technique that removes or modifies personal information so that it cannot be associated with a specific individual. Except for this section, none of the other provisions of this Privacy Policy applies to anonymized or aggregated customer data (i.e. information about our customers that we combine together so that it no longer identifies or references an individual customer).

Ibantek may use anonymized or aggregate customer data for any business purpose, including to better understand customer needs and behaviors, improve our products and services, conduct business intelligence and marketing, and detect security threats. We may perform our own analytics on anonymized data or enable analytics provided by third parties.

Types of data we may anonymize include, transaction data, click-stream data, performance metrics, and fraud indicators. Moreover, should you request that your information be deleted in accordance with the policies set forth more fully below, your information will be anonymized or aggregated, which complies with applicable law regarding deletion of personal information.

3. How information is collected

We obtain information about you during the application process, and also through your interactions with our Sites.

Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. We may provide additional “just-in-time” disclosures or information about the data processing practices of specific Services. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

We obtain the categories of personal information listed below from the following sources:

- Directly from you: For example, from forms you complete or by using our Products and Services.
- Indirectly from you: For example, from observing your actions on our Sites.
- Third Parties: For example, from third-party services which you connect to as part of using our Services.

During the Application Process: To process your initial application for funding, we may require your name, address, phone number, email address and other personal information. We may also require the name of your business, its address, its federal and state tax ID, the type of business, business location, average monthly sales, state of incorporation, name of Landlord. Such information is used primarily to process your order or as otherwise described herein. This is information you provide to us through our Sites.

Emails and telephone calls: We require an email address from you when you register for our services. We use your email for both transactional (e.g., application status, application updates, application confirmation, etc.) and promotional (e.g., newsletters, new product offerings, event notifications,

special third-party offers) purposes. E-mail messages we send you may contain code that enables our database to track your usage of the e-mails, including whether the email was opened and what links (if any) were clicked. If you would rather not receive promotional emails from us, please see the section below labeled “Choice/Opt-Out”. We reserve the right to send you certain communications relating to the Ibantek services, such as service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. We may also contact you by telephone or text message (including to any wireless number you may provide to us) solely in connection with Ibantek’s services. If you would rather not receive telephone calls or text messages from us, you may change or delete your number from your account preferences page(s), or ask to be removed from our contact list if you receive a call or text message from us. We fully comply with the requirements of the U.S. CAN-SPAM Act, the Telephone Sales Rule, and the Telephone Consumer Protection Act (TCPA).

Log files: Any time you visit any of our Sites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyze trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. For example, we may log your IP address for system administration purposes. IP addresses are logged to track a user’s session. This gives us an idea of which parts of our site users are visiting. We do not share the log files externally.

Cookies: We use “cookies” to keep track of some types of information while you are visiting our Sites or using our services. Cookies are very small files placed on your computer, and they allow us to count the number of visitors to our Sites and distinguish repeat visitors from new visitors. They also allow us to save user preferences and track user trends. We rely on cookies for the proper operation of our Sites; therefore if your browser is set to reject all cookies, the Sites will not function properly. Users who refuse cookies assume all responsibility for any resulting loss of functionality. We do not link the cookies to any personally identifiable information.

Web Beacons: "Web beacons" (also known as "clear gifs" and "pixel tags") are small transparent graphic images that are often used in conjunction with cookies in order to further personalize our Sites for our users and to collect a limited set of information about our visitors. We may also use web beacons in email communications in order to understand the behavior of our customers. We do not link the web beacons to any personally identifiable information.

Other sources and third parties: We may obtain information about you from third parties. We combine this third-party data with information we already have about you to create tailored advertising and other relevant product recommendations. If you provide information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. Any information obtained from a third-party will be used to assist matching your business with various lenders.

The sites contain links to other websites that are maintained by third parties. These third parties are solely responsible for their own websites and we encourage you to reach out to such third parties for copies of and information regarding their security practices. We do not control, and are not responsible for, the privacy and security practices of these third parties.

4. How your information is used

We use your information for a variety of reasons, all of which support Ibantek's Sites and Services.

Provide Ibantek services: We process your personal information to provide the Services to you. For example, when you wish to seek business financing from one of our financing partners, we require certain information such as your identification, contact information, and income information. We cannot provide you with Services without such information.

To provide Service communications: We send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of

important developments relating to your account that may affect how you can use our Services. You may not opt-out of receiving critical service communications, such as emails or mobile notifications sent for legal or security purposes;

To provide Customer service: We process your personal information when you contact us to resolve any questions, disputes, collect fees, or to troubleshoot problems. Without processing your personal information for such purposes, we cannot respond to your requests and ensure your uninterrupted use of the Services;

For research and development purposes: We process your personal information to better understand the way you use and interact with Ibantek's Services. In addition, we use such information to customize, measure, and improve Ibantek's Services and the content and layout of our applications, and to develop new services. Without such processing, we cannot ensure your continued enjoyment of our Services;

To enhance your experience: We process your personal information to provide a personalized experience, and implement the preferences you request. For example, you may choose to provide us with access to certain personal information stored by third parties. Without such processing, we may not be able to ensure your continued enjoyment of part or all of our Services;

To facilitate corporate acquisitions, mergers, or transactions: We may process any information regarding your account and use of our Services as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions. You have the option of closing your account if you do not wish to have your personal information processed for such purposes.

To maintain legal and regulatory compliance: Most of our core Services are subject to laws and regulations requiring us to collect, use, and store your personal information in certain ways. For example, Ibantek must identify and verify customers using our Services in order to comply with commercial lending laws across jurisdictions.

To enforce our terms in our user agreement and other agreements: Ibantek handles sensitive information, such as your

identification and financial data, so it is very important for us and our customers that we actively monitor, investigate, prevent, and mitigate any potentially prohibited or illegal activities, enforce our agreements with third parties, and/or prevent and detect violations of our posted user agreement or agreements for other Services;

To detect and prevent fraud: We process your personal information in order to help detect, prevent, and mitigate fraud and abuse of our services and to protect you against account compromise or information loss;

To ensure Quality control: We process your personal information for quality control and staff training to make sure we continue to provide you with accurate information. If we do not process personal information for quality control purposes, you may experience issues on the Services;

To ensure network and information security: We process your personal information in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations. The threat landscape on the internet is constantly evolving, which makes it more important than ever that we have accurate and up-to-date information about your use of our Services. Without processing your personal information, we may not be able to ensure the security of our Services;

5. Disclosure of consumer information to third parties

We may disclose your personal information as required by law, to provide the Services, and for legitimate business purposes.

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. We do not sell personal information.

1. **Disclosure By Law:** You acknowledge and agree that we may disclose information you provide if required to do so by law, at the request of a

third party, or if we, in our sole discretion, believe that disclosure is reasonable to (1) comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law) and (2) protect or defend Ibantek's, or a third party's, rights or property.

2. **Lenders and/or brokers.** By signing up for our services or submitting a request for a business loan product or service as offered on the sites, you signify your agreement to proceed and that you are consenting, acknowledging and agreeing to the disclosure of your information with lenders and/or brokers within our network. We will not perform a credit check without your authorization. Please be aware that the lenders, brokers, and/or other service providers with whom you are matched and with whom your information is shared may retain your information, even if you do not enter into an agreement for their products or services. Please contact each such party directly regarding their privacy and information policies. Also, if you enter into an agreement with a lender, broker, or other service provider through the Ibantek service and make changes to the information you have provided to us, we may share the updated information with such lenders, brokers, and/or service providers.
3. **Disclosure to Trusted Third Parties By Us:** Upon completing a profile on the site, and filling out the entirety of the application, we will share your information with third party service providers with whom you are matched. A list of those partners can be found on our partners page. By accepting the [Terms of Use](#), you agree to receive various marketing materials from our trusted third parties, including potential lenders and service providers. We are not responsible for the material of the third parties or their actions. Your information may also be shared with third-party contractors that provide services to Ibantek and are bound by this privacy policy. Your information will be treated as private and confidential by such third parties and not used for any other purpose than you authorize. In addition, from time to time, we may share personal information (such as e-mail or mailing address) about our user base with carefully selected third parties, so they can offer goods and

services that we believe may be of interest to our users. If you do not wish to receive offers from our trusted partners, you can change your email preferences at any time by following the steps outlined in the “Choice/Opt-Out” section below.

4. **Service Providers:** With service providers under contract who help with parts of our business operations. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else. Examples of the types of service providers we may share personal information with (other than those mentioned above) include:
 - Network infrastructure
 - Cloud storage
 - Payment processing
 - Transaction monitoring
 - Security
 - Document repository services
 - Customer support
 - Internet (e.g. ISPs)
 - Data analytics
 - Information Technology
 - Marketing
5. **Other Companies:** With companies or other entities that we plan to merge with or be acquired by. You will receive prior notice of any change in applicable policies.
6. **Professionals:** With our professional advisors who provide banking, legal, compliance, insurance, accounting, or other consulting services in order to complete third party financial, technical, compliance and legal audits of our operations or otherwise comply with our legal obligations.
7. **Miscellaneous:** We may disclose your personal information for any purpose with which you consent.

6. Updating, accessing, retaining, and deleting your information

You may choose to update, access, or delete your data; however, we may be legally required to retain your information to comply with the law.

You may update or access your contact information at any time by logging into your account and making any change or update. Any changes made will be updated immediately.

If you want to stop using your account you may deactivate it. When you deactivate an account, your information will not be sent to any further lenders, brokers, or other third parties, but the information will not be deleted. By deactivating your account you will have the ability to restore the account in its entirety.

You may delete your account from Ibantek in certain circumstances upon submitting a request to Ibantek to delete your account. In certain circumstances, Ibantek is legally required to continue to maintain the information in your account. In these circumstances, Ibantek will place your account into a deactivated status, will opt you out of all communications, and will disable your access to the account.

In the event that Ibantek is able to comply with your request to delete your account, data you provide to Ibantek will be retained by Ibantek in a commercially reasonable manner and to comply with relevant lending laws. Once your account is deleted, Ibantek will not share your information, and will only use your data for internal research and Ibantek marketing. Data that is retained by Ibantek will be retained for a commercially reasonable period of time as determined by Ibantek in conformance with applicable law.

We store your personal information securely throughout the life of your Ibantek Account. We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. While retention requirements vary by jurisdiction,

information about our typical retention periods for different aspects of your personal information are described below.

1. Personal information collected to comply with our legal obligations under financial, consumer protection, and commercial credit laws may be retained after account closure for as long as required under such laws.
2. Contact Information such as your name, email address and telephone number for marketing purposes is retained on an ongoing basis until you unsubscribe. Thereafter we will add your details to our suppression list to ensure we do not inadvertently market to you.
3. Content that you post on our such as support desk comments, photographs, videos, blog posts, and other content may be kept after you close your account for audit and crime prevention purposes (e.g. to prevent a known fraudulent actor from opening a new account).
4. Recording of our telephone calls with you may be kept for a period of up to six years.

Information collected via technical means such as cookies, web page counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

7. Security

We have taken steps to protect your information in a commercially reasonable manner.

We have extensive security measures in place to protect the loss, misuse and alteration of the information stored in our database. These measures include the use of industry standard encryption methods and administrative access to site data, as well as other proprietary security measures which are applied to all repositories and transfers of user information. We will exercise reasonable care in providing secure transmission of information between your computer and our servers, but given that no information transmitted over the Internet can be guaranteed 100% secure, we cannot ensure or

warrant the security of any information transmitted to us over the Internet and hence accept no liability for any unintentional disclosure. For further information, please see our [Terms of Use](#).

In the event there is a data breach at Ibantek, Ibantek will notify you as soon as reasonably practicable. We will notify you that a breach occurred, and any additional information needed to fulfill our obligation with breach notification laws and regulations.

Do not share your account login and/or password with any other individual. Your account login and/or password is sensitive and your sharing of your account information may lead to additional exposure to your account.

8. Choice / Opt out of Marketing

You may choose to discontinue your use of our services.

You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instruction included in these emails or contacting us at ffcra@lbantekcapital.com.

You can choose not to provide us with certain information, but this will likely result in the inability to use certain features of the site and to obtain the services and products you are seeking. As a general matter, do not post personal information on public forums. You are solely responsible for the posting of any personal information on public forums.

If, after signing up for our services, you decide you no longer wish to receive our services or future contact from lenders, brokers, or other third parties to which your information has been referred, you may cancel your account as discussed herein. Upon canceling your account, your information will no longer be sent to lenders, brokers, or other third parties. This does not guarantee that these lenders, brokers, or other third parties will cease contacting you or using your information. Please be sure to reach out to all lenders, brokers, and/or other third parties to ensure they cease contacting you.

Certain federal and state regulations require that we maintain a record of your information for certain periods of time. Due to these regulations, we may be unable to completely delete your information from our database until the time requirements of these regulations have expired.

9. Privacy Rights

You may be able to exercise certain rights regarding your personal information depending on state and federal laws.

Depending on applicable law where you reside, you may be able to assert certain rights related to your personal information identified below. If any of the rights listed below are not provided under law for your operating entity or jurisdiction, Ibantek has absolute discretion in providing you with those rights.

Your rights to personal information are not absolute. Depending upon the applicable law, access may be denied: (a) when denial of access is required or authorized by law; (b) If you are a resident of a state that does not provide for this right; (c) when granting access would have a negative impact on another's privacy; (d) to protect our rights and properties; or (e) where the request is frivolous or vexatious, or for other reasons.

1. **Access and portability.** You may request that we provide you a copy of your personal information held by us. This information will be provided without undue delay subject to a potential fee associated with gathering of the information (as permitted by law), unless such provision adversely affects the rights and freedoms of others. In certain circumstances, you may request to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another data controller.
2. **Rectification of incomplete or inaccurate personal information.** You may request us to rectify or update any of your personal information held by Ibantek that is inaccurate. You may do this at any time by

logging in to your account and clicking the Profile or My Account tab, and updating your information in our portal.

3. **Erasure.** You may request to erase your personal information, subject to applicable law. If you close your Ibantek Account, we will mark your account in our database as “Closed,” but will keep certain account information, including your request to erase, in our database for a period of time as described above. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account, and to comply with Ibantek legal obligations. However, if you close your account, your personal information will not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.
4. **Withdraw consent.** To the extent the processing of your personal information is based on your consent, you may withdraw your consent at any time. Your withdrawal will not affect the lawfulness of Ibantek’s processing based on consent before your withdrawal.
5. **Restriction of processing.** In some jurisdictions, applicable law may give you the right to restrict or object to us processing your personal information under certain circumstances. We may continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
6. **Automated individual decision-making, including profiling.** Ibantek relies on automated tools to help determine whether a transaction or a customer account presents a fraud or legal risk. In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal information, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.
7. **How to make a privacy request.** You can make privacy rights requests relating to your personal information by contacting us at

info@lbantek.com or by contacting customer service at +1 (888) 428-4159. When we receive an individual rights request via other intake methods, we may take steps to verify your identity before complying with the request to protect your privacy and security.

8. **How to lodge a complaint.** If you believe that we have infringed your rights, we encourage you to contact us at info@lbantek.com

10. California Consumer Privacy Act

Some states have passed additional privacy laws for residents, which rights can be found below.

In addition to the rights provided for above, the information contained in this section applies solely to those individuals who reside in the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

Effective January 1, 2020, pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), California residents have certain rights in relation to their personal information, subject to limited exceptions. Any terms defined in the CCPA have the same meaning when used in this California Privacy Rights section.

For personal information collected by us during the preceding 12 months that is not otherwise subject to an exception, California residents have the right to access and delete their personal information. Ibantek will not discriminate against those who exercise their rights. Specifically, if you exercise your rights, we will not deny you services, charge you different prices for services or provide you a different level or quality of services.

Ibantek does not sell or share your information in a manner that is contemplated by applicable California law.

Should Ibantek engage in any of the activities listed in this section, your ability to exercise these rights will be made available to you. You can exercise

your rights by contacting us at info@lbantek.com, by contacting customer service at +1 (888) 428-4159.

If you are a California resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.

11. Special Notice to Vermont Residents

Vermont residents have access to additional limits on the sharing of their personal information subject to certain exceptions.

Vermont law places additional limits on sharing information about Vermont residents so long as they remain residents of Vermont. In accordance with Vermont law, we will not share information we collect about Vermont residents to companies outside of Ibantek except: (1) As permitted by law; (2) To companies that perform marketing or other services on our behalf; (3) Name, contact and transaction and experience information to other financial institutions with which we have joint marketing agreements; or (4) With the authorization or consent of the Vermont resident. We also will not share non-transactional information about Vermont residents received from others within the Ibantek family of companies except with the authorization or consent of the Vermont resident.

12. Notification of Privacy Policy Changes

We reserve the right to update this Privacy Policy and will notify you if we do so; however, we encourage you to regularly review this policy for the latest information.

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on this Site. We encourage you to periodically review this page for the latest information on our privacy policy. When we make changes to this Privacy Policy we will revise the revision date at the top of the Privacy Policy.