

Privacy Policy
&
Online Privacy Statement



FACTS**WHAT DOES CREDIT ONE BANK, N.A.
DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- credit history and credit score
- payment history and transaction history

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Credit One Bank chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Credit One Bank, N.A. share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

**To limit
our sharing**

- Call 800-796-6245

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call 877-825-3242

What we do

<p>How does Credit One Bank protect my personal information?</p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and secured buildings.</p>
<p>How does Credit One Bank collect my personal information?</p>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ apply for a loan or give us your contact information ■ pay your bill or use your credit card ■ give us your income information <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<p>What happens when I limit sharing for an account I hold jointly with someone else?</p>	<p>Your choices will apply to everyone on your account.</p>

Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our Affiliates include the Sherman Financial Group LLC family of companies; financial companies such as Credit One Financial and Resurgent.</i>
<p>Nonaffiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Non-affiliates we share with can include retail lenders, insurance companies, direct marketing companies, loan lead providers, customer service agencies and collection agencies.</i>
<p>Joint marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Our joint marketing partners include credit card companies, financial institutions and loan service providers.</i>

Other important information

Depending on where you live, you may have additional privacy protections under some state laws. For example, certain state laws may restrict the types of information we may disclose about you, limit the parties with whom we may share such information, or require us to provide you with additional notices or opt-out rights. We will comply with applicable state laws before sharing non-public personal information about you. We may do this by sending a separate notice of those rights to you.

Online Privacy Statement

This Online Privacy Statement ("Privacy Statement") describes Credit One Bank's online and mobile privacy practices and applies to websites, online applications that run on smartphones, tablets, mobile devices ("apps"), and other online services that we offer which link to this Privacy Statement.

Information you provided Credit One when you applied for or obtained a product or service from us is also governed by a separate notice entitled Privacy Policy. If you are such an applicant or customer, please refer to that notice for additional information about our privacy practices.

By using this website or our mobile apps, you agree to the terms and conditions of this Privacy Statement.

Information We Collect – and How We Collect It

Our websites and apps are not intended to be used by children. We do not intentionally collect personal information from children under 13 without permission from their parent or legal guardians. For more information about the Children's Online Privacy Protection Act (COPPA), please refer to the FTC's website at ftc.gov/privacy/privacyinitiatives/childrens.html.

When you use our website or our mobile apps, we may collect Personal Information that you submit to us voluntarily, or Online Activity Data that we collect passively.

Personal Information is information such as your name, mailing address, email address, telephone number, Social Security number, or other information that identifies you. This information may be collected when you voluntarily provide it to us through forms on our website or in our mobile apps. These forms could include survey forms, credit card applications, contest entries, and sign in pages for online banking or mobile application access.

Online Activity Data includes information such as your IP address, browser type, and display/screen settings; how you interact with our website and mobile advertisements; mobile device and advertising IDs; social media preferences and other social media data; and other data that may be aggregated and that doesn't identify individual consumers/customers. This data may be collected using cookies and other online tracking devices such as pixel tags and clear GIFs (also known as web beacons), depending on your browser settings. *Cookies* are small text files that a website's server places on your computer and can allow websites that you visit to track your computer's browsing activities. A *web beacon* is a small string of software code that represents a graphic image on a website or email. Credit One may also partner with third parties to deliver advertisements and monitor activities on our own website and other websites. These partners may use cookies, web beacons, and/or other monitoring technologies to compile statistics about website visitors. Additionally, Credit One may collect Online Activity Data when you use our mobile app or your mobile device browser to access our website, i.e. geolocation data (if you have enabled location services on your device). Credit One may also collect Online Activity Data or information such as your likes, interests, feedback, and preferences when you interact with our official pages on social media websites such as Facebook, or from our social media partners (but only if you choose to share with them and they, in turn, share that information with us). Please refer to the policies of those companies to better understand your rights and obligations with regard to your activity on those websites.

How We Use Information

We may use Personal Information and Online Activity Data we have collected for a variety of reasons, including:

- to enable you to apply for a Credit One credit card
- to enable you to use online tools or perform certain online transactions
- to service and manage your account, including responding to or updating you on inquiries, or to contact you about your accounts or feedback
- to offer you special products and services and deliver advertisements to you in the form of banner ads, interstitial pages (ads that appear as you sign in or sign out of your online accounts) or other promotions
- to analyze whether our ads, promotions, and offers are effective
- to help us determine whether you might be interested in new products or services, and to improve existing products and services
- to verify your identity and/or location to allow access to your accounts, and conduct online transactions
- to manage fraud and data security risk
- to personalize and optimize your website browsing and mobile app experiences by examining which parts of our website you visit or which aspect of our mobile apps you find most useful
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements
- to share with trusted third parties who are contractually obligated to keep such information confidential and to use it only to provide the services we have asked them to perform. For a description of how Credit One may share information collected from consumers who have applied for or obtained a consumer product or service from us, please refer to the Privacy Policy.

Managing Your Online and Mobile Preferences

You are not required to provide Personal Information to browse our websites. If you provide us with Personal Information to obtain a product or service from us, our Privacy Policy governs how we share Personal Information with our affiliates and third parties.

As you access our online services, cookies and similar technologies allow us to customize content and advertisements for our products and services on our websites or mobile apps. In order to make content and advertising as relevant as possible, we may use information about your relationship with us (such as types of accounts and transactional information). Using cookies can give you additional or easier access to certain features on our website (such as allowing you to sign in easier), and can allow us to provide you with more personalized offers. Currently, our website does not respond to browser "do not track" signals. You can set your browser to not accept cookies or to indicate when cookies are sent.

Some mobile devices come with a non-permanent advertising identifier or ID which gives companies the ability to serve targeted ads to a specific mobile device. In many cases, you can turn off mobile device ad tracking or you can reset the advertising identifier at any time within

your mobile device privacy settings. You may also choose to turn off location tracking on your mobile device. By turning off ad tracking or location tracking on your mobile device, you may still see the same number of ads as before, but they may be less relevant because they will not be based on your interests.

Behavioral Advertising on Third Party Sites

Certain Credit One partners may use unique cookies to collect Online Activity Data on our website or mobile apps to advertise on third party websites Credit One products and services that may be of interest to you. Our partners are subject to their own privacy policies. To explore options for opting out of behavioral advertising, visit aboutads.info/choices or click on the AdChoices icon in an ad and follow the instructions. You may also use the Network Advertising Initiative's (NAI) Opt-Out Tool found at networkadvertising.org/choices, or other tools provided by the publishing platform. Opting out relies on information in the unique cookies placed on your web browser by our partners, so if you delete cookies, use a different device, or change web browsers, you may need to opt out again. Additionally, we may partner with websites like Google and Yahoo to display ads to you based on search terms you use on those websites. Please review the privacy policies of those websites for instructions on how to limit these ads. Please note that you may still receive general online advertising from Credit One even after you adjust your ad preferences with certain web search engines or opt out of online advertising through AdChoices or the NAI tool. Such advertising, however, will not be based on Online Activity Data or search term information.

Email

Our marketing emails include instructions on how to opt out of receiving such emails in the future.

Updating Your Information

Keeping your account information up-to-date is important. You may review or update certain account information by signing in to your account online. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the Contact Us option on our site, or call 1-877-825-3242 or write to us using the contact information listed on your account statements, records, or other account materials.

Links

Our websites may include links to third-party websites. These third parties are not subject to this Privacy Statement or to the Privacy Policy. Please review their privacy notices when visiting these sites.

Information Security

At Credit One, we are committed to protecting your personal and financial information. If we collect identifying information from you, we will protect that information with security measures based on internationally recognized security standards, regulations, and industry-based best practices.

Changes to this Privacy Statement

Credit One may change its online privacy practices in the future and we may revise this Privacy Statement to reflect material changes. This Privacy Statement was last revised January 1, 2015, and is effective as of that date.

Glossary

AdChoices: Allows individuals to opt out of browser-enabled interest-based advertising by some or all participating companies, using opt-out cookies to store your preferences in your browser.

Browser: An application used for accessing sites or information on a computer network. Examples include Internet Explorer, Safari, Chrome, and Firefox.

Business partners: Companies we partner with to jointly market and/or deliver products and services to you. Business partners include affinity or co-brand business partners. They may not use this information to independently market to you unless you consent.

Cookies: Small pieces of text that are placed in your browser by the websites you visit and the advertising companies and content partners for those sites. Cookies do not store personal information.

Privacy Policy: A Credit One product-specific privacy notice, which we provide to customers at account opening and annually thereafter pursuant to federal law. It describes our privacy practices and provides you the right to opt out of certain types of information sharing.

IP address: A unique "Internet Protocol" number assigned to a device connected to the Internet. Credit One treats IP addresses as non-personal information unless otherwise required by law.

Operating system: Software that controls the operation of a computer and directs the processing of programs, such as Microsoft Windows or Apple Mac OS.

Pixel tags: Software code placed on a website or in an email that transfers information about a user's activity from your computer to a server connected to the Internet.

Service providers: Vendors with whom we have a contractual relationship to perform services on our behalf. Vendors may not use personal information for any purpose other than carrying out those services.

Session: The time from when a customer is signed in to a website to when the customer signs out.

Social media site: An online platform that allows users to create a public profile and interact with other users on the website, such as Facebook or LinkedIn.

Third-party websites: Sites that are not owned or operated by Credit One and are not subject to our Online Privacy Statement.

Web beacon (can be referred to as a pixel or web bug): Enables two websites to share information. It consists of a small piece of software code that incorporates a graphic image on a

web page or email. Web beacons can be used for activities like site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization.