

INSTANT-BANK-VERIFICATION (“IBV”) CONSENT

By clicking the “Continue” or “Agree” button on the page that presents the IBV Consent link, you agree to provide the recent transaction data from your bank account or prepaid debit card (“*credentialed banking data*”) if such credentialed banking data is required by the lender, account holder, or other provider of the financial service for which you are applying.

In this IBV Consent document, “*Consent*” means your agreement to provide *us* (defined below) your credentialed banking data, your agreement to the permitted uses of such data, and your acknowledgement that the privacy policy of the financial data aggregator (e.g., EDGE™, Plaid®, or Yodlee®) governs how your online banking credentials are stored and shared—not the privacy policy of financial service provider or website operator (e.g., CreditNinja® or NinjaCard®). Please review this IBV Consent for details concerning the matters listed below.

- What credentialed banking data is and how we obtain it.
- The permitted uses of your credentialed banking data.
- What privacy policy governs how your online banking credentials are stored and shared.

1. Entities Receiving Your Consent

In this IBV Consent, the terms “*we*,” “*our*,” and “*us*” mean, collectively, the Fintechs (defined below), the Unaffiliated FIs (defined below) for which the Fintechs provide services, and any other person or entity conducting business under the brand CreditNinja® or NinjaCard® or operating on the website www.creditninja.com or www.ninjacard.com.

Without limiting the generality of the previous paragraph, the terms *we*, *our*, and *us* include NinjaHoldco, LLC and those subsidiaries of NinjaHoldco, LLC listed below (collectively the “*Fintechs*”), including:

- CreditNinja Lending, LLC;
- NinjaCard, LLC;
- Ninja Loan Finder, LLC;
- NinjaServicing, LLC;
- KMD Lending, LLC;
- KMD Wisconsin, LLC; and
- Financial Marketing and Servicing, LLC.

Additionally, the terms *we*, *our*, and *us* include the unaffiliated financial institutions for which the Fintechs provide services (collectively the “*Unaffiliated FIs*”). These Fintech services include:

- arranging installment loans made by
 - First Electronic Bank, an FDIC-insured, state-chartered industrial bank headquartered in Salt Lake City, Utah (“*FEB*”) and
 - CC Connect, a division of Capital Community Bank, an FDIC-insured, Utah state-chartered bank (“*CCB*”);
- acting as a credit access business (“*CAB*”) for Texas installment loans made by
 - PCAM CREDIT VI, LLC, a Delaware limited liability company (“*PCAM*”);
- acting as a program manager for the NinjaCard® Flexbanking™ services performed by
 - Republic Bank of Chicago, Member FDIC (“*RBC*”);

- acting as a program manager for the NinjaCard® Flexline™ services provided by FEB and otherwise arranging lines-of-credit (“LOC”) made by FEB; or
- providing access to deposit accounts through RBC.

2. Consent to Instant Bank Verification

If the financial-service provider requires you to provide your credentialed banking data to determine your eligibility for the product you requested, then the provider will use the services of a financial data aggregator such as Edge, LLC (“EDGE”), Plaid Technologies, Inc.® (“Plaid”), or Yodlee, Inc.® (“Yodlee”). During the CreditNinja® application flow on the www.creditninja.com website or during the NinjaCard® application flow on the www.ninjacard.com website, one of these financial data aggregators will present you an online tool that captures your online banking credentials (the “IBV Widget”).

The IBV Widget will provide a link to the financial data aggregator’s privacy policy. Importantly, the financial data aggregator’s privacy policy, not our privacy policy, will govern the storage and sharing of your online banking credentials (e.g., your user ID and password). Although the financial data aggregator will transmit your recent transaction data to us so we can determine your eligibility for the financial service you requested, we do not store, share, or even have access to your online banking credentials.

By way of background, EDGE™, Plaid®, and Yodlee® are financial data aggregators that transmit consumer-authorized financial data to us and to a wide variety of other lenders, financial institutions, and merchants. For more information about the consumer-authorized financial data aggregation industry, you can consult your state consumer credit administrator or can review the CFPB’s Consumer Protection [Principles](#) for Consumer-Authorized Financial Data Sharing and Aggregation.

3. Identity Verification and Ability-to-Repay Verification

If the financial-service provider requires you to provide your credentialed banking data but you do not wish to do so, then you should decline to input your online banking credentials to the IBV Widget and should simply end your completion of the application. In such case, your application will be deemed incomplete because you have not met the provider’s conditions for submitting a completed application.

But if you do input your online banking credentials to the IBV Widget, then the following procedures will apply.

- You will provide the financial data aggregator with your login credentials to the bank account or prepaid debit card that you are using to verify your identity or your ability-to-repay the credit you have requested (collectively, your “Checking Account”).
- The financial data aggregator will obtain recent transactions from your Checking Account and will transmit that data to us. We, in turn, will verify the Checking Account owner and will parse your recent Checking Account transactions to determine: (a) the debt service and other recurring payments withdrawn from your Checking Account (collectively the “Payment”); and (b) the amount, interval, and reliability of the income deposited to your Checking Account (collectively the “Income”). Depending on the provider’s eligibility requirements, we may also calculate a monthly Payment-to-Income ratio.

- Although we will review the Checking Account data transmitted by the financial data aggregator to us, we will never store, share, or even have access to your online banking credentials. Instead, the online banking credentials that you input to the IBV Widget will be stored and shared only by the financial data aggregator. Consequently, it is the financial data aggregator’s privacy policy, not our privacy policy, that will govern how the online banking credentials you input to the IBV Widget will be stored and shared.
- Before you input your online banking credentials into the IBV Widget, the widget will provide that aggregator’s privacy policy for your review and acceptance. As a convenience, this IBV Consent will provide those same financial-data-aggregator privacy policies in Section 5 below. Please follow the links provided to review the respective privacy policies of the three financial data aggregators we use, and call our Customer Service Group (information below) should any of these links become stale.

By signing this IBV Consent, you authorize us to receive, review, and store recent transaction data from your Checking Account if you authorize a financial data aggregator to obtain such data and transmit it to us for parsing.

4. Other Uses

Subject to applicable laws and other limitations, we may use the recent transaction data from your Checking Account for purposes other than verifying your identity, ability-to-repay, or other eligibility requirements imposed by the provider of the financial service you have requested. These other uses may include those listed below (collectively “*Other Uses*”).

- Verifying consumer identity and account ownership.
- Determining your eligibility for extensions or refinances of a closed-end loan or your eligibility for a credit-limit adjustment to an open-end loan.
- Improving our service quality and product offerings.

By signing this IBV Consent, you authorize us to use IBV data for these Other Uses.

5. Links to Respective Privacy Policies of EDGE™, Plaid®, and Yodlee®

By utilizing the instant bank verification services provided by EDGE™ (“*EDGE™ Services*”), you acknowledge and agree that the terms of the EDGE™ Privacy Policy (currently located at <https://www.edgescore.com/about/privacy>) will govern EDGE’s use of such information, and you expressly agree to the terms and conditions of the EDGE™ Privacy Policy. Further, you expressly grant EDGE™ the right, power, and authority to access and transmit your information as reasonably necessary for EDGE™ to provide the EDGE™ Services to you.

By utilizing the instant bank verification services provided by Plaid® (the “*Plaid® Services*”), you acknowledge and agree that the terms of the Plaid® Privacy Policy (currently located at <https://plaid.com/legal/#end-user-privacy-policy>) will govern Plaid’s use of such information, and you expressly agree to the terms and conditions of the Plaid® Privacy Policy. Further, you expressly grant Plaid® the right, power, and authority to access and transmit your information as reasonably necessary for Plaid® to provide the Plaid® Services to you. To the extent you previously utilized account linking and aggregation services through our previous service provider, Quovo, Inc., you expressly authorize Quovo, Inc. to transmit any information or data arising out of those services to Plaid® so that Plaid can offer you its services.

By utilizing the instant bank verification services provided by Yodlee® (the “Yodlee® Services”), you acknowledge and agree that the terms of the Yodlee® Privacy Policy (currently located at <https://stage.customercare.yodlee.com/ycc/privacy.yodlee.do>) will govern Yodlee’s use of such information, and you expressly agree to the terms and conditions of the Yodlee® Privacy Policy. Further, you expressly grant Yodlee® the right, power, and authority to access and transmit your information as reasonably necessary for Yodlee® to provide the Yodlee® Services to you.

6. CreditNinja® and NinjaCard® Customer Service Groups

This IBV Consent contemplates instances when you must or may contact CreditNinja® or NinjaCard® with questions or instructions.

Contact our Customer Services Group, as set forth below, for financial services performed by CreditNinja Lending, LLC, Ninja Loan Finder, LLC, NinjaServicing, LLC, KMD Lending, LLC, KMD Wisconsin, LLC, or Financial Marketing and Servicing or for any other financial services delivered under the CreditNinja® brand or from the www.creditninja.com website (e.g., FEB installment loans, CCB installment loans, or PCAM Texas installment loans).

CreditNinja, Attn: Customer Service Group
222 South Riverside Plaza, Suite 2200
Chicago, Illinois 60606
support@creditninja.com
855-646-5201 (855-NINJA01)

Contact our Customer Service Group, as set forth below, for financial services performed by NinjaCard, LLC, for deposit account services provided by RBC, and for any other financial services delivered under the NinjaCard® brand or from the www.ninjacard.com website (e.g., Flexbanking™ provided by RBC or Flexline™ provided by FEB).

NinjaCard, Attn: Customer Service Group
222 South Riverside Plaza, Suite 2200
Chicago, Illinois 60606
support@ninjacard.com
855-646-5242 (855-NINJA42)