

## PRIVACY NOTICE

At Compass Working Capital, Inc. we value our relationship of trust and confidence with our clients. We take our responsibility to protect your personal information very seriously. This privacy notice explains our policies and procedures for collecting, disclosing and protecting the personal information that our current and former clients provide to us.

<b>FACTS</b>	<b>WHAT DOES COMPASS WORKING CAPITAL DO WITH YOUR PERSONAL INFORMATION?</b>	
<b>WHY?</b>	Financial companies choose how they share your personal information, which means your personally identifiable 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.	
<b>WHAT?</b>	<p>The types of personal information we collect and share depend on the program or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Employment information</li> <li>• Income and expense information, and housing information</li> <li>• Credit history and credit scores</li> <li>• Credit card or other debt information</li> </ul> <p>We share this information only as described in the information release form and the participation agreement that applies to your specific Compass program. When you are <i>no longer</i> our client, we continue to share your information as described in this notice and the information release form.</p>	
<b>HOW?</b>	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Compass Working Capital chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>	<b>Does Compass share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes—</b> Such as to provide you with our services, process your transactions, maintain your account(s), and respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes—</b> To offer our programs and services to you	No	We don't share
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	No	We don't share
<b>For non-affiliates' everyday business purposes—</b> We also share certain information with program partners, including housing authorities, governmental agencies and community organizations for which Compass provides financial coaching and education services	Yes, as described in the client information release form	No
<b>QUESTIONS?</b>	Call (617) 790-0810 or go to <a href="http://www.compassworkingcapital.org/privacy">www.compassworkingcapital.org/privacy</a>	

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Compass Working Capital, Inc.
<b>What we do</b>	
<b>How does Compass Working Capital protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal and state law. These measures include computer safeguards and secured files and buildings. We also limit access to your personal information to only Compass employees who need it to provide services to you. Once your relationship with Compass ends, we will continue to treat and safeguard your information as described in this notice.
<b>How does Compass Working Capital collect my personal information?</b>	<p>We collect your personal information in the following ways:</p> <ul style="list-style-type: none"> <li>• <b>Contact Information.</b> When you sign up for our mailing list, workshops or to ask about our programs, we collect contact information, such as your name, phone number, e-mail, and address.</li> <li>• <b>Application Information.</b> When you apply to our programs, we collect your name, email, phone number, current and previous address, social security number, date of birth, and other contact information. We may also collect demographic information, such as your age, gender and race/ethnicity, marital status and education.</li> <li>• <b>Program Information.</b> When you participate in our programs, we may also collect your credit scores, housing and employment information, income, tax information and program attendance.</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, housing authorities and other program partners. You consent to the collection of your personal information in the information release form and participation agreement that applies to your specific Compass program.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit some but not all sharing related to:</p> <ul style="list-style-type: none"> <li>• affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• nonaffiliates to market to you</li> </ul> <p>State laws may give you additional rights to limit sharing.</p>
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. Compass has no affiliates.
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Nonaffiliates we share with include - housing authorities, program partners, and research and evaluation partners.</li> <li>• Compass does not share with nonaffiliates so they can market to you.</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Compass does not jointly market.