



Privacy Policy & Privacy Notice

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**Legal Entities:**

Gatekeeper Financial, LLC, and its transaction administrator Acme Solar Finance, Collectively referred to “us”, “we”, “our”.

Privacy Principles

We value the privacy of your information. This Privacy Policy describes how we collect, use, and safeguard the information you provide to us when applying for lending products and services. Please note our Privacy Policy may be updated from time to time without notification sent out to you. By providing us your personal information, you consent to our Privacy Policy.

Encryption

Whenever you request or present sensitive financial or personal data, we will encrypt that data to prevent others from accessing it while in transit. We utilize Secure Socket Layer (SSL) encryption for this purpose. Most browsers display a padlock icon when SSL is being used on a secure page. We require the use of 128-bit SSL encryption in order to protect sensitive information.

Information Collected During Visits

We collect generic information about visitors to our Website, or websites where our products are offered. This information includes the date and time of access, the Internet Service Provider's address (for example, America Online), the web browser used, the Internet address of the visitor's computer, and the names of the pages on our Web site that are visited. We do not collect personally identifying information from anyone who is merely visiting or browsing our Website. We may, however, collect information if a visitor chooses to provide such information, such as when a visitor applies for a product or service online or sends us an e-mail.

Information Collected From Customers

We may also collect and use information about our customers in order to provide products and services, administer our account relationships, and better serve our customers' needs. Customers may provide us with information in connection with an application for a product or service, to update information after an account is opened, or when our customers communicate with us, or one of our authorized third parties, electronically, by mail or over the telephone.

Cookies

We may utilize “cookies” to help authenticate our customers' identities and to help facilitate the exchange of information between our systems and our customers' systems. These tiny electronic files are also used to help us determine what portions of our Web site visitors find most helpful. This helps us improve the Web site and make it easier to use.

Communication by Email

Please keep in mind that messages you send us by Internet e-mail may not be secure. Do not send us any confidential or personal information by Internet e-mail.

Privacy Policy

Our Privacy Notice on sharing personal information can be viewed [here](#) or by contacting us by Email at GatekeeperFinancial.Support@wileyplatform.com

This Residential Solar Loan Program is originated by Acme Solar Finance, LLC. Gatekeeper Financial, LLC is not the Lender of this loan.



FACTS	WHAT DOES GATEKEEPER FINANCIAL, LLC 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 • Date of Birth • Credit History and Credit Score When you are no longer our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons we might share your personal information, the reason we choose to share, and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DO WE SHARE?	CAN YOU LIMIT SHARING?
<i>For our everyday business purposes - such as to process your transaction(s), maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.</i>	Yes	No
<i>For our marketing purposes - to offer our products and services to you.</i>	Yes	Yes
<i>For joint marketing with other financial companies.</i>	No	We don't share
<i>For our affiliates' everyday business purposes - information about your transactions and experience.</i>	Yes	No
<i>For our affiliates to market to you.</i>	No	We don't share
<i>For our non-affiliates to market to you.</i>	No	We don't share

QUESTIONS?	CALL: (301) 287-5380 OR EMAIL: GATEKEEPERFINANCIAL.SUPPORT@WILEYPLATFORM.COM
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WHO WE ARE	
Who is providing this notice?	Gatekeeper Financial, LLC
This Residential Solar Loan Program is originated by Acme Solar Finance, LLC. Gatekeeper Financial, LLC is not the Lender of this loan.	

**WHAT WE DO**

How does Gatekeeper Financial protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files. We also restrict access to your personal information to those employees who need to know this information to perform their job duties.
How does Gatekeeper Financial collect my personal information?	We collect your personal information, for example, when you • Provide it to us in your application for services • Show your driver license or government issued ID • Provide it to us through other documents We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only • Sharing information about your creditworthiness for affiliates' everyday business purposes • Sharing for affiliates to market to you • Sharing for non-affiliates to market to you State law and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

DEFINITIONS

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Our affiliates include Acme Solar Finance.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. • We do not share with non-affiliates so they can market to you.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. • We do not jointly market.

OTHER IMPORTANT INFORMATION

For Alaska, Illinois, Maryland and North Dakota Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing – without your authorization.

For California Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing – without your authorization. We will also limit our sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.

For Massachusetts, Mississippi and New Jersey Customers. We will not share personal information from deposit or share relationships with nonaffiliates either for them to market to you or for joint marketing – without your authorization.

For Vermont Customers. We will not share personal information with nonaffiliates for them to market to you without your authorization and we will not share personal information with affiliates or for joint marketing about your creditworthiness without your authorization.



CALIFORNIA CONSUMER PRIVACY ACT NOTICE

Legal Entities:

Gatekeeper Financial, LLC, and its transaction administrator, Acme Solar Finance. Collectively referred to “us”, “we”, “our”.

Applicability

Your privacy is important to us. This California Consumer Privacy Act Notice explains how we collect, use, and disclose personal information relating to California residents covered by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). This “Notice” constitutes our notice at collection and our privacy policy pursuant to the CCPA.

Introduction

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident and includes certain categories of Personal Information discussed below that constitute “Sensitive Personal Information.” The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”). The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Notice does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Collection, Use and Disclosure of Personal Information

- In the past 12 months we may have collected and disclosed for our business purposes each of the following categories of Personal Information relating to California residents covered by this Notice:
- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers;
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Biometric information;
- Internet or other electronic network activity information, such as browsing history, search history, and information regarding a California resident’s interaction with an internet website application, or advertisement;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Audio, electronic, visual, thermal, or similar information such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer;
- Education information, directly related to a student; and maintained by an educational agency or institution or by a party acting for the agency or institution;
- Inferences drawn from any of the Personal Information listed above to create a profile about a California resident reflecting their preferences, characteristics, psychological trends, predispositions, behavior, and attitudes, intelligence, abilities, and aptitudes; and
- The following categories of Sensitive Personal Information:



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- > Personal Information that reveals
 - > A California resident's Social Security, driver's license, state identification card, or passport number;
 - > A California resident's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
 - > A California resident's precise geolocation;
 - > A California resident's racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership;
 - > The contents of a California resident's mail, email, and text messages unless the business is the intended recipient of the communication;
 - > The processing of biometric information for the purpose of uniquely identifying a California resident; and
 - > Personal information collected and analyzed concerning a California resident's health.

In addition to collecting Personal Information ourselves, we additionally coordinate with third parties to collect Personal Information on our behalf, which third parties are engaged in one or more of the business practices described below:

- Delivering advertising and marketing, including on non-affiliated persons' or entities' sites and mobile apps;
- Facilitating events and event management, including virtual and/or in-person events (e.g., hotels, restaurants, virtual platforms, audio/visual capabilities, food/beverage, transportation services, etc.); and
- Referral sources, whether for purposes of identifying candidates for employment, identifying new client opportunities, or recommending vendors or contractors.

The categories of sources from which we collected Personal Information are:

- Directly from a California resident or the individual's representatives;
- Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities;
- Public Record Sources (Federal, State or Local Government Sources);
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media;
- Information from Client Directed persons or entities or Institutions representing a Client/Prospect; and
- Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member).

With respect to each category of Personal Information that we disclosed for a business purpose in the past 12 months, the categories of persons or entities to whom we disclosed that Personal Information are:

- Affiliates of Gatekeeper Financial;
- Service Providers and Contractors who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, supporting research activities, credit financing, event management, and real estate management;
- Other Service Providers and Contractors who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, real estate expertise, appraisal expertise, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers;
- Other Service Providers and Contractors who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, vehicle loan processes and aggregators (at the direction of the customer);
- Other persons or entities to whom we transfer Personal Information as an asset that is part of a merger, acquisition or other transaction in which such other person or entity assumes control of all or part of the business;
- Government Agencies as required by laws and regulations; and
- Other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your Personal Information.



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We do not disclose Personal Information to any other categories of third party.

We collect, use and disclose for our business purposes Personal Information, including Sensitive Personal Information, relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business or commercial purposes, including the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services (except for cross-context behavioral advertising, a type of targeted advertising), providing analytic services, providing research services, facilitating event management and execution, managing our real estate portfolio, or providing similar services;
- Helping to ensure security and integrity to the extent the use of Personal Information is reasonably necessary and proportionate for these purposes;
- Short-term, transient use, including, but not limited to, non personalized advertising shown as part of a current interaction with us, where the information is not disclosed to a third party and is not used to build a profile or otherwise alter the California resident's experience outside the current interaction with us;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance that service;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

How Long We Retain Personal Information

The length of time that we intend to retain each category of Personal Information will depend on several criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

Sale or Sharing of Personal Information

In the 12 months preceding the date of this Notice, we have not "sold" or "shared" Personal Information or Sensitive Personal Information subject to the CCPA nor have we "sold" or "shared" Personal Information or Sensitive Personal Information of minors under the age of 16.

For purposes of this Notice:

- "sold" means the disclosure of Personal Information or Sensitive Personal Information to a third party for monetary or other valuable consideration; and
- "shared" means the disclosure of Personal Information or Sensitive Personal Information to a third party for cross-context behavioral advertising.

How We Use Sensitive Personal Information

We only use or disclose Sensitive Personal Information for the following purposes consistent with CCPA Regulations:

- To perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services. For example, a California resident's precise geolocation may be used by a mobile application that is providing them with directions on how to get to a specific location.



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- To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident's log-in information to a data security company that it has hired to investigate and remediate a data breach that involved that individual's account.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may use information about a California resident's ethnicity and/or the contents of email and text messages to investigate claims of racial discrimination or hate speech.
- To ensure the physical safety of natural persons, provided that the use of a California resident's Personal Information is reasonably necessary and proportionate for this purpose. For example, we may disclose a California resident's geolocation information to law enforcement to investigate an alleged kidnapping.
- For short-term, transient use, including, but not limited to, non personalized advertising shown as part of a California resident's current interaction with us.
- To perform services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying a California resident's information, processing payments, providing financing, providing analytic services, providing storage.
- To verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

Rights under the CCPA

If you are a California resident covered by the CCPA, you have the right to:

1. Receive this Notice at or before the point of collection of your Personal Information.
2. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. Request we correct inaccurate Personal Information that we maintain about you.
 - a. the categories of Personal Information about you that we collected;
 - b. the categories of sources from which the Personal Information was collected;
 - c. the purpose for collecting the Personal Information about you;
 - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that were disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - e. the specific pieces of Personal Information we collected about you;
 - b. Request we correct inaccurate Personal Information that we maintain about you.
 - c. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception.
3. Be free from unlawful discrimination for exercising your rights under the CCPA.

Please see the section below entitled, "How to Exercise Your Rights," for instructions explaining how you can exercise these rights described above.

Requests for specific pieces of Personal Information will require additional information to verify your identity.

For individuals submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom the request is made.

For a company or organization submitting a request on behalf of another person, we may require proof of authorization from the individual such as a Power of Attorney and verification of identity directly from the person for whom the request is made.



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In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another California resident or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government-issued identification numbers, financial account numbers, unique biometric data, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

How We Process Opt-Out Preferences

We permit California residents, and consumers in other states to exercise their right to opt-out of sale/sharing of their information. Please note, however, we do not "sell" or "share" personal information with any third parties, as such terms are defined by the CCPA.

Additionally, we permit consumers who have applied for a loan on the Acme Solar Finance Platform to opt out of certain methods of communication related to processing their request for credit including: 1) artificial or prerecorded voice message systems; and 2) text messaging systems.

How to Exercise Your Rights

Consumers may submit a request to exercise their rights by:

Emailing: GatekeeperFinancial.Support@wileyplatform.com

Calling us at: (301) 287-5380

Texting us at: (301) 287-5380

**If the phone number the request is received from does not match our records, we may have to speak with you over the phone to process your request.*

Questions or Concerns

You may contact us with questions or concerns about this Notice and opt out practices by:

Writing us at:

Gatekeeper Financial, LLC

9520 Gerwig Lane, Suite T, Columbia, MD 21046

Emailing us at: GatekeeperFinancial.Support@wileyplatform.com

Changes to This California Consumer Privacy Act Notice

We may change or update this Notice from time to time. When we complete the updates, we will send you the revised Notice with the new revision date.

This Residential Solar Loan Program is originated by Acme Solar Finance, LLC. Gatekeeper Financial, LLC is not the Lender of this loan.