



ZRENT PRIVACY POLICY

ZSuite Technologies, Inc. ("ZSuite"), which operates ZRent effective August 1, 2019, respects the privacy of our ZRent users and protecting your confidential information is a top priority for ZSuite.

What kind of information do you collect through ZRent?

As part of your ZRent set-up process, we collect information regarding your bank account, including account number(s), for the payment or receipt of funds through ZRent. We also may collect additional identifying information from you in order to confirm your identity, such as your name, address, email address or other information. In addition, in order to make your use of ZRent as convenient and efficient as possible, we maintain information about your transactions through ZRent.

How do you obtain the information?

We collect information directly from you. We retain communications from you (such as letters or e-mails) in order to handle questions you may have and to keep records of your request or concerns regarding our products and services. We also use your letters or e-mails to measure how effectively we have addressed your concerns.

Who has access to customer information?

We have strict internal policies against unauthorized use or disclosure of information collected through ZRent. Information is accessible only to employees who need it to conduct your financial affairs, or to our trusted third party vendors responsible for processing your ZRent transactions. We emphasize the importance of confidentiality through our Code of Conduct, employee training, operating procedures, privacy policy, oversight of our vendors, and contractual requirements of our vendors, as we require all the businesses with which we have a relationship to maintain the confidentiality of consumer information. Both ZSuite and our vendors maintain physical, electronic, and procedural safeguards according to established security standards to protect your information.

Why do you need this information?

We maintain information and data about you to maintain the security of your accounts and to protect you and the entire institution against fraud. We need clear and accurate information to be able to positively identify you and authenticate your transactions authorized through ZRent. We are also required by laws and regulations to gather certain information.

How you do protect ZRent user information?

We encrypt all ZRent user financial account information stored our databases, and both ZSuite and our vendors maintain physical, electronic, and procedural safeguards according to established security standards to protect your information. ZSuite also fully complies with all data security requirements of federal law, including the Gramm-Leach-Bliley Act and the Massachusetts data security regulations.

Are there any regulations allowing disclosure of account information?

Yes. Under current law, we are allowed to share certain information - such as your name, address and information about your accounts - between affiliates and subsidiaries, for marketing or joint marketing purposes, or as necessary to our third party vendors necessary for processing the payments made through ZRent. In some cases, such as a fraud investigation or in response to a validly issued search warrant or subpoena, we may be required by law to provide certain information to law enforcement agencies.

Why do you share information with third-party companies?

We use third parties to help us process your ZRent payments. We may also use outside companies to help us with fraud investigation. Finally, we may share information to market our own products to you or to jointly market products with other institutions pursuant to an existing joint marketing agreement.

What kind of information do you share with third-party companies?

The information shared depends on the product or service we are providing to you. We may share your name, address, Social Security Number, or other relevant information, depending on the situation. We will not share any of your information with any third-party for the purpose of marketing their products or services to you.

Will the third parties keep my information confidential?

We will not share information with any company that does not agree to keep your information confidential. We carefully select the third-party companies we work with, and any information that is shared is always subject to strict confidentiality agreement(s). Moreover, it is a violation of federal law for a third party to reuse customer information received from us unless that information is also publicly available elsewhere.

Is it possible to prevent information sharing with third parties?

We do not sell nor rent information to any non-affiliated third-party except through a joint marketing agreement where ZSuite partners with that third party. We do not share information with third parties such as insurance or investment firms, unless you initiate such a request. By law, except as indicated in the Privacy notice provided to you and further outlined below, we would not be able to share your information without giving you the opportunity to "Opt-Out", that is, you would be directing us not to make such disclosures (other than disclosures permitted by law). However, insofar as we do not share information with such parties, you do not need to take any action to prevent sharing of such information.

Will I receive a Privacy Notice in the mail every year?

Under the Privacy Rule (Regulation P) issued under the Gramm-Leach-Bliley Act, ZSuite is required to provide an initial Privacy notice to ZRent users prior to providing any information to a non-affiliated party for joint marketing purposes. However, recent changes to federal law make additional annual notices unnecessary unless ZSuite further edits or changes its Privacy notice. A copy of ZSuite's Privacy Notice can be found below.

FACTS

WHAT DOES ZSUITE TECHNOLOGIES, INC. 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:

Name	Address	Account Number(s)
Social Security Number	Email Address	Transaction Histories

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 Customer 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 ZSuite Technologies, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ZSuite Technologies Inc, 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	No	We Don't Share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We Don't Share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We Don't Share
For our affiliates to market to you	No	We Don't Share
For non-affiliates to market to you	No	We Don't Share

Questions?

Call 781-641-8691 or email zrent@zrent.net

Who we are

Who is providing this notice?	ZSuite Technologies, Inc.
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What we do

How does ZSuite Technologies, Inc. protect my personal information?	<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 and secured files and buildings.</p> <p>We also maintain other physical, electronic and procedural safeguards to protect this information and limit employee access when appropriate.</p>
How does ZSuite Technologies, Inc. collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account or; • Authorize ACH debits or credits or; • Make deposits or; • Communicate with us; or • Through third parties, such as our vendors, for purposes of verifying your identity or requested transactions.
Why can't I limit all sharing?	<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 non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • ZSuite Technologies, Inc. does not share with our affiliates for their everyday purposes or so they can market to you.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • ZSuite Technologies, Inc. does not share with non-affiliates so they can market to you.
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • ZSuite Technologies, Inc. does not jointly market.