

Array Website Privacy Policy

This Privacy Policy ("Policy") is designed to help you understand how Array US, Inc. and its related organizations and affiliates, including Build Credit LLC HelloPrivacy, LLC, Earn Up LLC, and Hansa Technology Company, Inc. (collectively "Array", "we", "us" or "our"), collects, uses and shares personal information collected through this website. We value your privacy, and we will not share your personal information with third parties except as described in this Policy without your consent.

By using THIS site, you agree to be bound by this Policy. If you do not agree with any of the terms of the Policy, please do not use THIS website OR PROVIDE US WITH YOUR INFORMATION.

What this Policy Covers

This Policy applies to our collection, use and sharing of your personal information (a) when you visit our websites, use any of our mobile applications, or access our platform of products (collectively the "Site"), (b) when you enroll to receive our communications or participate in our online or offline activities or events, (c) create an account, or (d) that we obtain from third parties such as resellers, database vendors, content publishers and suppliers.

This Policy does not apply to any information or websites not owned or operated by Array or information collected by Array by other means. For example, this Policy does not apply to the information we collect about you if you create an account with us and engage us to provide financial services. You can read more about our practices related to such personal information for BuildCredit Account [here](#) and Array+ [here](#).

Personal Information We Collect

This section of our Policy describes the categories of personal information we collect about you and the different ways in which we collect your personal information.

Information You Give Us. Personal information you may provide through the Site or otherwise communicate to us includes:

- *Contact information.* We collect information about you when you provide contact information to us via email or through the Site, including as a result of creating an account, or registering for a contest. This information may include your first and last name, email address, mailing address, phone number, and billing address.
- *Payment and financial information.* We collect your payment or financial information, such as credit card or bank account number, when you set up an account to pay for our services.
- *Sensitive personal information.* We collect information that may be considered sensitive, such as your country of citizenship, social security number, and driver's license number, as needed when you set up an account or request services from us.
- *Correspondence.* We may collect personal information you provide when you request information, respond to surveys, or otherwise correspond with us.
- *Social media.* We may collect social media related information including handles and user names.
- *Communications and marketing.* We may collect communications such as market research, surveys, or telephone calls with customer service, as well as marketing information such as advertising preferences.
- *Other information.* We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Policy.

Information We Get From Others. We may obtain additional information about you from third party sources, such as service providers, vendors, social media sites, and advertising agencies and publicly available sources to provide you with more relevant information

about our services. This information may include your contact information, buying preferences, or cookie information.

Information Automatically Collected. Our servers and third party service providers may automatically record cookie information in connection with your use of the Site, which includes information such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy, below, for more information.

Mobile Subscriber Authorization. We may request information from your wireless carrier for identification and fraud detection purposes. You authorize your wireless carrier to disclose information about your account, such as subscriber status, payment method and device details, including but not limited to your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber details, if available, to support identity verification, fraud avoidance and other uses in support of transactions for the duration of your business relationship with us. This information may also be shared with other companies to support your transactions with us and for identity verification and fraud avoidance purposes.

Statistical Analyses. We use tools like Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. This information is collected via cookies and other identifiers that we and third parties place on our site. See our Cookie Policy, below, for more information.

Sensitive Personal Information. We may collect some sensitive personal information such as social security numbers and bank account information through the Site as necessary when you create an account and/or use our products or services. In collecting this sensitive personal information, we respect individual privacy, protect against unauthorized access to or use of information, and comply fully with all laws and government regulations in the collection, use, storage, display, distribution and disposal of such information. Authorized uses of sensitive information within our organization are limited to uses which are necessary to: a) meet our legal and regulatory requirements; or b) facilitate access to services, transactions, facilities and information.

How We Use Your Personal Information

This section of our Policy describes the different purposes for which we may use the personal information we collect about you.

To Provide our Services and Communicate With You. We use your contact information, payment information and other personal information to:

- provide you with services; and
- to respond to your requests, questions, comments, and feedback.

To Improve or Operate our Site. We use your cookie information to:

- provide, maintain and improve the Site;
- better understand your needs and interests, and personalize your experience with the Site; and
- perform website analytics and database management services.

To Send You Marketing Communications. We and our service providers may use your contact information to send you newsletters, promotions or other marketing communications, but you may opt out of receiving them as described in the Your Choices section below. We may also contract with third-party advertising and social media companies to display ads on our products or services and other sites. These companies may use cookies and similar technologies to collect information about you (including the device data and online activity data described above) over time across our products and services, other sites and services, or your interaction with our emails, and use that information to serve ads that they think will interest you.

To Create and Maintain Your Account. In order to utilize the services provided through the Site, you must create an account using certain personal information, including your name, email address, and phone number, social security number, and bank account information. You have choices about the information included in your account profile. You do not have to provide additional information on your profile; however, additional profile information may help you get more from our services. It is your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal information to your profile that you would not want to be publicly available.

To Personalize This Site. We may use your cookie information to personalize your Site experience and communications.

For Consumer Credit Reporting. We collect, use and/or disclose personal information for permissible purposes under the Fair Credit Reporting Act (FCRA), including, but not limited to, assist credit providers to make decisions to extend credit or enter into transactions with you, assist lenders and other creditors with their portfolio management, assist employees with employment verification, and other uses at the consent of the consumer.

For Compliance, Fraud Prevention and Safety. We may use some or all of your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (e) where permitted by law in connection with a legal investigation; and (f) to enforce your agreement with us. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.

For Research and Development. We may use your personal information for research and development purposes, including to analyze and improve the Site and develop other products and services. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We convert personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Site and promote our business.

With Your Consent. In some cases we may ask for your consent to collect, use or share your personal information.

How We Share your Personal Information

This section of our Policy describes the categories of personal information we share with third parties and the types of third parties with whom we share that information.

We do not sell your personal information; however we may share your personal information with third parties for a number of reasons. For example, we may use third parties to help us design and operate the Site, provide services to support the Site, help us analyze our data, process your financial information, or send information on our behalf about services and events in which you may be interested.

Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Policy. Specifically, we share your personal information with the following categories of third parties:

Related and Affiliated Organizations. We may share all of the personal information we collect about you with our affiliates and related organizations, such as HelloPrivacy, LLC, Build Credit LLC, Earn Up LLC, and Hansa Technology Company, Inc., for use consistent with this Policy, including, but not limited to, their marketing purposes.

Service Providers and Business Partners. We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you. This information may include your contact information, payment information, and cookie information. We may also share your personal information with our business partners who offer a service to you jointly with us. We may also disclose some or all of your personal information to professional advisors such as lawyers, banks, auditors, and insurers, where necessary in the course of the professional services they render to us.

We use Plaid Inc. ("Plaid") and other third parties to gather your data from financial institutions. By using our Site, you grant us, Plaid, and our other third parties, as applicable, the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. Further, you agree to your personal and financial information being transferred, stored, and processed by Plaid or another third party as necessary in accordance with the applicable privacy policy (e.g. [Plaid end user privacy policy](#)). We may also use financial institutions to process your ACH funds transfers from your funding source bank account to us or our payment processor as necessary for use of our Sites.

Compliance, Fraud Prevention and Safety. We may disclose some or all of the personal information we have collected about you as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the section "For Compliance, Fraud Prevention and Safety."

Payment Processors. Any payment card information you use to make a purchase on the Site is collected and processed by our payment processors. Our processors are committed to complying with the Payment Card Industry Data Security Standard (PCI-DSS) and using industry standard security. Our processors may use your payment information in accordance with their own privacy policies.

Business Transfers. We may sell, transfer or otherwise share some or all of our business or assets, including all of the personal information we have collected about you, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

Your Choices

This section of our Policy describes your choices with respect to the personal information you provide and the marketing communications you may receive. In addition, some states may grant you additional rights as further described in the "Location-Specific Disclosures" section, below.

Opt Out of Communications. You may opt out of email notifications by changing the communication preferences in your account settings or by using the contact information provided at the end of this Policy.

Opt Out of Marketing Communications. You may opt out of marketing-related emails by changing the communication preferences in your account settings or by using the contact information provided at the end of this Policy. To opt out of other forms of marketing communications, please contact us using the contact information provided at the end of this Policy.

Consequences of Not Providing Personal Information. You are not required to provide all personal information identified in this Policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

Cookie Policy

This section of our Policy describes how we and our business partners may collect and store information about you and your use of the Site through cookies and other tracking technologies.

What are Cookies? Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the website are called "first party cookies". Cookies set by parties other than the website are called "third party cookies". Third party cookies enable third party features or functionality, such as advertising or website analytics, to be provided on or through the website. The parties that set these third party cookies can recognize your computer or device both when it visits the website in question and also when it visits certain other websites and/or mobile apps.

What Cookies and Other Tracking Technologies do We Use? We use several different kinds of cookies on this Site, including strictly necessary cookies, which are cookies that are necessary for the Site to function and cannot be switched off in our systems; performance cookies, which allow us to count visits and traffic sources so we can measure and improve the performance of our Site; and functional cookies, which enable the Site to provide enhanced functionality and personalization.

Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time, like web beacons (sometimes called “tracking pixels” or “clear gifs”). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning. If you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website at a later date.

Third-Party Cookies. In addition to our own cookies, we collaborate with various third-party service providers who also use cookies to help us optimize our website, to understand more about the visitors to our website, and to advertise to you. For example, we use [Google Analytics](#) to provide us with demographic information about our visitors and to help us analyze how people use our website. To learn more about how Google uses cookies, please click the link above or visit its website to view its privacy policy.

Google Services. We use Google Analytics to help us gather statistical information about the visitors to our Site and to market our services. This information is collected via cookies and other identifiers that we and third parties place on our site. We and our third party partners may use this information to gain a better understanding of the users of our Site and to improve our products and services. To understand how Google collects and processes data, including through the use of cookies and other technologies, please visit <https://policies.google.com/technologies/partner-sites>. To opt out of the Google Analytics, we encourage you to check out Google Analytics' currently available [opt-outs](#) for the web.

How Do We Use Cookies? We and our third party partners may use cookies to gain a better understanding of the users of our Site, customize your Site experience, and to improve our services. To learn more about the use of cookies, pixels, or other technologies to deliver more relevant advertising, and to better understand how to manage your personal information, including access to and use by certain service providers, please visit <http://www.aboutads.info/choices>.

How Can You Disable Cookies and Other Tracking Technology? Depending on the type of browser and device that you use, you may have the ability to control the type of information that these tools use. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com. Some Internet browsers also may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Other Important Privacy Information

Third Party Sites and Services. The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more. We are not responsible for any transactions that occur between you and a third party website or service. Should you purchase any products or services from a third party, you must contact the third party site directly regarding any disputes that might occur, including but not limited to delayed shipping, missing products, damaged goods, inadequate services, or pricing and billing discrepancies.

Security. The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the absolute security of your personal information.

International Data Use and Cross-Border Transfers. We are located in the United States and have affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. However, we will handle your personal information in accordance with this Policy regardless of where your personal information is kept. Regarding transfers from the European Economic Area, Switzerland or United Kingdom to the United States, we rely on the derogations for transfers which are necessary to perform the transaction with you. Where required by law, you

may request a copy of the suitable mechanisms we have in place by contacting us as detailed at the end of this Policy. If you reside in other non-US jurisdictions, your use of the Site or provision of any personal information constitutes your consent for the transfer of such data to the United States for the purposes identified in this Policy. If you have questions about cross-border transfers, please contact us as detailed at the end of this Policy.

Verifying, Changing, and Deleting Your Information. If you have registered for an account through our Site, you can access, review and manage many changes yourself via your account, including updating your profile information and changing your communication preferences. If the information you are seeking is not available within your account, you can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

Children.

The Site is not intended for use by anyone under the age of 18, nor do we knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, you should not attempt to use the Site or send any information about yourself to us.

Changes to this Policy

We reserve the right to modify this Policy at any time. If we make changes to this Policy, we will post them on the Site and indicate the effective date of the change. It is your responsibility to monitor this site periodically for changes or modifications to the terms of the Privacy Policy.

Location-Specific Disclosures

The law requires that we provide additional disclosures to residents of certain countries, regions and states. Please see below for disclosures that may be applicable to you.

Notice to California Residents

If you are a California resident, this section applies to you in addition to the rest of this Policy. Please note that we may collect, use and share additional personal information about you that is governed by laws other than California law, such as the Gramm-Leach-Bliley Act, and that our activities related to such personal information (such as when you sign up as a customer and create an account with us) are not disclosed here. Click [here](#) for BuildCredit Account and [here](#) for Array+ to learn more about our privacy practices related to such personal information and products.

Personal Information We Collect. We collect your personal information when you interact with our Site or otherwise communicate with us. In the past 12 months, we have collected the following categories of personal information from consumers and have used that information for the following purposes:

Category of Personal Information Collected	Business Purpose of Collection	Source(s) of Information
Identifiers, including real name, signature postal address, Internet Protocol address, email address, telephone numbers.	To market our services and communicate with you. In addition, we collect your IP address anonymously to provide you more relevant content, track original Site visits, and optimize your Site experience.	Directly from you when you provide it to us. We also collect unique personal identifiers such as IP address passively from you when you visit our Site.

Internet or other electronic network activity information, including browsing history, search history, and information regarding an individual's interaction with an internet Web site, application or advertisement	To provide you more relevant content, track original Site visits, and optimize your Site experience	Passively when you visit our Site or receive or interact with our communications
Geolocation Data	To support website functionality and identify traffic patterns.	Passively when you visit our Site

We will not collect additional categories of personal information or use or retain the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

Retaining Your Information. We will only keep your personal information in an accessible form which can identify you for as long as we need to for the purposes for which it was collected. Because retention periods vary depending on the purpose for collection, we use certain categories and criteria to determine how long we keep personal information. Specifically, we retain personal information processed for marketing purposes for as long as you have not opted out of marketing. If you ask us to no longer use your personal information for marketing purposes, we will need to retain certain information in our database to ensure that we do not accidentally send you marketing materials. We also retain Site activity information, including IP address, geolocation, and electronic network activity information for a period of one year.

Sharing Your Information We do not share your personal information with third parties for cross-context behavioral advertising purposes or otherwise sell your personal information, but we may disclose your personal information to third parties for a business purpose. In the past 12 months, we have disclosed the following categories of personal information to certain third party subcontractors and services providers for a business purpose:

Category of Personal Information Disclosed	Category of Third Parties with Whom Information is Disclosed for our Business Purposes	Business or Commercial Purpose for Disclosure
Identifiers	Service providers, including our website service providers, email marketing automation and data analytics providers	To help us provide our Site and services and market our services to you.
Internet or other electronic network activity information and Geolocation Data	Service Providers, including our data analytics providers, email marketing automation and marketing service providers	To help us provide our Site and services and market our services to you.

Sensitive Personal Information. We do not use or disclose sensitive personal information except as necessary to provide you with our services, to prevent fraud or for other legally permissible purposes.

Personal Information of Children. We have no actual knowledge that we sell or share personal information of consumers under 16 years of age.

Your Rights. California residents have certain rights regarding their personal information:

- *Right to Know.* You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).
- *Right to Delete.* You may request that we delete certain personal information we have collected about you, with certain exceptions.
- *Right to Correct.* You may request that we correct inaccurate personal information that we maintain about you.
- *Shine the Light.* Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes.

Exercising Your Rights. To exercise your rights above, please submit a request to us by emailing us at compliance@array.com or calling us toll-free at 833-742-0200. Please describe your request with sufficient detail so we can properly respond to your request. As part of your request, please specify which right you are exercising and be prepared to provide your name and contact information. We may ask for additional information to verify your identity. The information you provide in your request and any follow up information we ask for from you will be used solely to verify your request. After receiving your request, we may need to contact you for further information and will notify you if your request has been granted or declined, or if an exception applies to your request. Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. We will not discriminate against you if you choose to exercise your rights.

Responding to Your Rights Request. We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. In response to your request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable. We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

Notice to Oregon residents:

If you are an Oregon resident, this section applies to you in addition to the rest of this Policy. Please note that we may collect, use and share additional personal information about you that is governed by laws other than Oregon law, such as the Gramm-Leach-Bliley Act, and that our activities related to such personal information (such as when you sign up as a customer and create an account with us) are not disclosed here. Click [here](#) for BuildCredit Account and [here](#) for Array+ to learn more about our privacy practices related to such personal information.

We are Array US, Inc.

We do not process personal information of our website visitors or any children that is considered "sensitive data" under Oregon law, and we will obtain your consent before we process any sensitive data about you. We also do not knowingly process personal data of consumers under the ages of 16 or process information for purposes of targeted advertising, profiling in furtherance of decisions that produce legal effects or effects of similar significance, or selling personal information.

Oregon law gives you certain rights regarding your personal information, subject to certain exceptions:

- *Right to Correct.* You may request that we correct inaccurate personal information we maintain about you.
- *Right to Delete.* You may request that we delete certain personal information we have collected about you, with certain exceptions.
- *Right of Access.* You have the right to confirm whether we are processing your personal information and to access such personal information, and to receive a copy of such personal information. You also have a right to receive a list of specific third parties to which we have disclosed [your personal data/any personal data].

Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. You may submit a request by contacting us as detailed at the end of this Policy.

We will try to respond to your request within 45 days and notify you if your request has been granted or declined, or if an exception applies to your request. If we cannot authenticate your request using commercially reasonable efforts, we may request that you provide additional information. If we need more time, we will contact you with the reason and the extension period. We will deliver our written response by mail or electronically, at your option. Our response will also explain the reasons we cannot comply with any request, if applicable. We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request. You have the right to appeal our refusal to take action on a rights request within a reasonable period of time after receiving our decision by contacting us as detailed at the end of this Policy. We will try to inform you of our decision in writing within 45 days after receipt of your appeal with a written explanation of our decision.

How to Contact Us

For further information or questions about this Policy, you may contact us as follows:

Array

2200 N. Federal Hwy., Suite 217

Boca Raton, FL 33431

E-mail: compliance@array.com

Phone: (833) 742-0200

This Policy was last updated October 7, 2026.