

Privacy Policy

LTi Corporate Policy

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Version Control

Version	Change Date	Change Comments
1.0	Jul-2021	Initial Creation, matches published policy on www.ltisolutions.com
1.1	Jan-2022	Updates for Privacy Shield re-certification
2.0	Jul-2023	Updates for DPF and sunset of Privacy Shield
2.1	Sep-2023	Updates for DPF and UK Extension
2.2	Jul-2024	Updates for DPF and UK Extension

Policy Owner	Head of IT
Policy Approver(s)	LTi Security Council
Related Policies or Procedures	Security & Compliance Program
Effective Date	12-Jul-2024

Purpose

The LTI Privacy Policy is maintained on the company website and a copy of that policy can be found in this document. For the website location use the following link.

<https://www.ltisolutions.com/privacy-policy/>

Scope

The LTI Privacy Policy is in scope for all LTI team members.

Policy

LTi Technology Solutions – Privacy Statement

LTi Technology Solutions (f/k/a LeaseTeam, Inc.) is an industry leader who, for over 25 years, has provided software, support, training and strategic consulting services to more than 250 financial organizations in the equipment finance and leasing industry.

Protecting business and consumer privacy is extremely important to LTi Technology Solutions (“LTi” or the “Company”). This Privacy Statement describes LTi’s privacy practices in relation to information we collect on our website

(<https://www.ltisolutions.com>) and describes our privacy practices with respect to other personal information that is processed and stored within our software as a service on behalf of our customers. LTi is subject to the investigatory and enforcement powers of the Federal Trade Commission.

LTi complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce. LTi has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Website

This Privacy Statement covers the information practices of LTi’s website, specifically: <https://www.ltisolutions.com>. When we collect personal Information we follow the EU-U.S. DPF principles.

LTi’s website may contain links to other websites. The information practices or the content of such other websites is governed by the privacy statements of such other websites. The Company encourages you to review the privacy statements of other websites to understand their information practices.

When requesting additional information about LTi’s products or services, LTi requests that you provide personal contact information, such as name, company name, address, phone number, and email address (“Contact Information”). Entry of this data is optional. The website contains a “consent” checkbox that you must check in order to receive information from LTi. The Company uses contact information to perform the services requested. For example, if you fill out a “Contact Me” web form, the Company will use the information provided to contact you about your interest in the services. In addition,

the Company may also use contact information for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the products and/or services and to send you information regarding the Company and its products.

When registering for certain LTI events, LTI may require you to provide the Company with billing information, such as billing name and address and credit card number. Use of this data is limited to collection of the event fee only and is not retained on any LTI systems.

LTI only collects data that is relevant to its intended use. Required contact information and billing information are referred to collectively as “Customer Data”.

As you navigate LTI’s website, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (“Web Site Navigational Information”). Website navigational information includes standard information from your web browser (such as browser type and browser language) and the actions you take on the Company’s website (such as the web pages viewed and the links clicked).

LTI uses website navigational information to operate and improve the website. The Company may also use website navigational information alone or in combination with customer data to provide personalized information about LTI.

LTI uses cookies to make interactions with the Company’s website easy and meaningful. When you visit the Company’s website, LTI’s servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you choose to identify yourself to LTI, either by responding to a promotional offer, opening an account, or filling out a web form (such as a “Contact Me” form), you remain anonymous to the Company.

Web Beacons

LTI uses web beacons, alone or in conjunction with cookies, to compile information about customers and visitors’ usage of the Company’s website and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, LTI may place web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to the Company’s website. LTI uses web beacons to operate and improve the Company’s website and email communications.

Sharing of Information Collected

Unless described in this Privacy Statement, LTI does not share, sell, rent, or trade customer data with third parties for their promotional purposes. From time to time, LTI may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from LTI, the Company may share customer data collected in connection with your purchase or expression of interest with our joint promotion partner(s). LTI does not control our business partners' use of the customer data we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service. LTI uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use billing information except for the sole purpose of credit card processing on the Company's behalf.

Data Retention

LTI will retain your Personal Information for the period necessary to fulfill the purpose outlined in this Privacy Policy unless a longer retention period is required by applicable data privacy law. LTI takes reasonable steps to ensure that your Personal Information is accurate, complete, current and otherwise reliable for its intended use.

Compelled Disclosure

LTI reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights.

LTI acknowledges the rights of EU and UK individuals to access their personal data to inspect, correct, or erase it. EU and UK individuals who wish to exercise this right may do so by writing to LTI's UK office at:

LTI Technology Solutions
Attn. Tyler Barker

Altwood Road
Maidenhead, Berkshire
SL6 RFP

You may also contact via email to LTI's EU representative, Tyler Barker (tbarker@ltisolutions.com).

Please be aware that LTI may be required to disclose an individual's personal information in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

Software-as-a-Service Data

LTi offers software-as-a-service products to companies in the equipment finance industry (“Software”). LTi customers enter personal information into the software for performing credit adjudication, generating and executing contracts and servicing the contract. We do not use, copy, share, sell, distribute, display or make any information available to any third party, except as may be required by law, without the prior written consent of the customer. LTi does not perform any processing of special categories of personal data or relating to criminal convictions and offenses.

LTi shall hold the information in confidence and may access the information only for the purpose of providing services, preventing or addressing service or technical problems, at a customer’s request in connection with customer support matters, or as may be required by law. LTi takes appropriate physical, technical and organizational measures to protect the information from loss, misuse, unauthorized access or disclosure, alteration and destruction. LTi is liable for appropriate onward transfers of personal data to third parties.

Changes to this Privacy Statement

LTi may revise this policy from time-to-time consistent with the EU-U.S. DPF Principles and the UK Extension to the EU-U.S. DPF. We will post the revised policy on this website.

Contacting Us

Questions regarding this Privacy Statement or the information practices of the Company’s website should be directed to LTi Privacy by mailing LTi at:

LTi Technology Solutions
Attn: Privacy Officer
4139 South 143rd Circle
Omaha, NE 68137

EU-U.S. DPF Complaints

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, LTi commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF should first contact LTi at:

LTi Technology Solutions
Attn: Privacy Officer

4139 South 143rd Circle
Omaha, NE 68137

LTi has further committed to refer unresolved privacy complaints under the DPF Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2>

LTi complies with the possibility, under certain limited conditions, that individuals may invoke binding arbitration before the EU-U.S. DPF Panel.