

## Big Picture Loans Website Privacy Policy

In this Website Privacy Policy (the "Privacy Policy"), the words "You" and "Your" mean the visitor. The words "Big Picture Loans", "Company", "We", "Us", and "Our", mean Big Picture Loans, LLC. Big Picture Loans is a wholly owned subsidiary of Tribal Economic Development Holdings, LLC, a wholly owned and operated economic arm and instrumentality of the Lac Vieux Desert Band of Lake Superior Chippewa Indians ("Tribe"), created for the benefit of the Tribe and operating pursuant to Tribal law. Big Picture Loans is licensed and regulated by the Tribal Financial Services Regulatory Authority, an independent regulatory body of the Tribe. Big Picture Loans operates in accordance with the Lac Vieux Desert Band of Lake Superior Chippewa Indians Tribal Consumer Financial Services Regulatory Code ("Code"). A complete copy of the Code can be found at [Tribal Consumer Financial Services Regulatory Code.pdf](#).

This Privacy Policy covers the collection, use, and disclosure of personal information that may be collected by Big Picture Loans anytime You interact with the Company, such as when You visit Our website, when You apply for a loan, or when You call Our customer support associates. Please take a moment to carefully read the following to learn more about Our information practices, including what type of information is gathered, how the information is used and for what purposes, to whom We disclose the information, and how We safeguard Your personal information. Your privacy is a priority at Big Picture Loans, and We go to great lengths to protect it.

You acknowledge that this Privacy Policy is part of Our Terms of Website Use, and by accessing or using Our website, You agree to be bound by all its terms and conditions. If You do not agree to these terms, please do not access or use this website.

### Changes to this Privacy Policy

In all things, We constantly aim to do the right thing and always seek to improve. If We need to update this policy, We will do so to be more clear, open, and honest with You. Such modification will be effective upon its posting to Our website; it is therefore important that You review this policy regularly.

### Why We Collect Information

We collect information about You to respond to Your inquiry regarding one of Our loan products, to offer You one of Our loan products, to keep You informed of new loan products, to inform You of loan product upgrades or modifications, and to inform You of special offers.

### What Information We Collect

#### Personal Data

Personal information is data that can be used to identify or contact a single person. Personal information does not include anonymous data, or data where the identity of the individual has been irretrievably removed.

We may collect, use, store and transfer different kinds of personal data about You which We have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, salutation, company name, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from You and other details of products and services You have purchased from Us, and payments processed in connection with the use of the Services.
- **Technical Data** includes internet protocol (IP) address, internet service provider (ISP), date/time stamp, Your login data, browser type, language and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices You use to access this website.
- **Profile Data** includes Your username and password, preferences, feedback and survey responses.
- **Usage Data** includes information about how You use Our app or products.
- **Marketing and Communications Data** includes Your preferences in receiving marketing from Us and our third parties and Your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from Your personal data but is not considered personal data in law as this data does not directly or indirectly reveal Your identity. For example, We may aggregate Your Usage Data to calculate the percentage of users accessing a specific website feature. However, if We combine or connect Aggregated Data with Your personal data so that it can directly or indirectly identify You, We treat the combined data as personal data which will be used in accordance with this privacy notice.

#### Online Activity

You may, at any time, explore the content available on Our website without ever submitting personal information about Yourself. However, we may collect information about Your online activity including, but not limited to, Your IP address, location, device type,

browser type, referral source, time spent on website, and pages viewed.

This website uses remarketing services to advertise on third-party websites (e.g., search engines) to previous visitors of Our website. Remarketing places a cookie on Your web enabled device that allows placement on websites You visit.

### **Text Message Terms**

Big Picture Loans, LLC may send you text messages for non-telemarketing purposes regarding account and servicing information. You can cancel this service at any time by replying "STOP" to a text message. Message frequency varies. Message and Data rates may apply. Carriers are not liable for any delays or undelivered messages. For all questions about text message services you can email us at [support@bigpictureloans.com](mailto:support@bigpictureloans.com)

### **Children Under the Age of 13**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If You are under 13, do not use or provide any information on this Website or through any of its features or register on the Website. If We learn We have collected or received personal information from a child under 13 without verification of parental consent, We will delete that information. If You believe We might have any information from or about a child under 13, please contact Us at [Support@BigPictureLoans.com](mailto:Support@BigPictureLoans.com).

### **How We Use Personal Information**

We will primarily use Your Personal Information to provide Our products and services to You, as required by Our agreements with You. We will also use Personal Information to enhance the operation of Our website, offer Our products and services, improve Our marketing and promotional efforts, statistically analyze website use, improve Our product and service offerings, and customize Our website's content, layout, and services. We may use Personal Information to deliver information to You and to contact You regarding administrative notices. We may also use Personal Information to resolve disputes, troubleshoot problems and enforce Our agreements with You, including Our Terms of Website Use and this Privacy Policy. If You are a customer or an applicable consumer under the Gramm-Leach-Bliley Act (GLBA) then certain information We collect is subject to the Lac Vieux Desert Band of Lake Superior Chippewa Indians Tribal Consumer Financial Services Regulatory Code ("Code") and the principles of the GLBA and the treatment of this information is stated in Our [Privacy Notice](#) for Your review.

### **What Information We Share**

We will only share information as allowed by the Code, applicable law and described in this Privacy Policy. **We will not sell Your personal data to any third party, unless specifically authorized by You.** For example, during the application process you may choose to check a box that currently states "I agree that if Big Picture Loans is unable to approve my loan application, I would like it to use the information I provided in my application to help me find another lender who may approve my loan".)

We may disclose Your personal information to Our parent, subsidiaries, and affiliates or to Our contractors, service providers, and other third parties We use to support Our business. We may also disclose Your personal information if We believe that We are required to do so by applicable law; to comply with legal process or governmental requests.

Your personal information may be shared with credit bureaus to determine Your creditworthiness or to occasionally review Your credit.

We may share information with third parties in order to verify Your identity, pre-fill loan applications, and facilitate Your pre-qualification for a loan.

### **Cookies**

Big Picture Loans and its service providers use cookies to administer the website, personalize Your online experience and save You time, track user online activity, provide advertisements and gather demographic information about Our users. Cookies help Us recall certain information about You when You make subsequent visits.

You can turn off cookie tracking in Your web browser's privacy settings. See below links for instructions on how to enable or disable cookies on Your browser.

- Chrome
- Internet Explorer
- Safari
- Firefox

## **Unsubscribing**

You can unsubscribe from receiving digital marketing communication offers from Big Picture Loans at any time by clicking the unsubscribe link located at the bottom of any marketing email. Additionally, users can go to [www.BigPictureLoans.com](http://www.BigPictureLoans.com) for more opt out options.

## **Privacy Policies of Third-Party Websites and Third-Party Requirements**

Except as otherwise provided in this Privacy Policy, this document only addresses the use and disclosure of information We collect from You. Other websites accessible through Our website have their own privacy policies and data collection, use and disclosure practices and other requirements. Please consult each website's privacy policy. We are not responsible for the policies or practices of third parties. Additionally, other companies which place advertising on Our website may collect information about You when You view or click on their advertising through the use of cookies. We cannot control this collection of information. You should contact these advertisers directly if You have any questions about their use of the information that they collect.

You authorize your wireless operator to disclose your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber and device details, if available, to Big Picture Loans and service providers for the duration of the business relationship, solely for identity verification and fraud avoidance.

## **Our Security Procedures**

We take careful steps to safeguard customer information. We restrict access to Your personal and account information to those employees who need to know that information to perform their jobs, and We provide regular training to Our employees on privacy, information security, and their obligation to safeguard Your information. We maintain physical, electronic, and procedural safeguards that comply with industry standards to protect Your personal information and We regularly test those safeguards.

You can safeguard Your personal information by taking a few simple precautions. Protect Your account numbers, passwords, PIN's, and customer access numbers. Never disclose confidential information to unknown callers. You should always use a secure browser and current virus detection software, and never open email from unknown sources.

## **Contact Us**

If You have any questions about this Privacy Policy, the practices of this website, or Your dealings with this website, please contact us at:

### **Big Picture Loans**

Customer Support

P.O Box 704

Watersmeet, MI 49969

1.800.957.6141

[support@bigpictureloans.com](mailto:support@bigpictureloans.com)