



SPARTAN FINANCIAL SERVICES CORP.

Consumer Financial Information Privacy Notice

Effective Date: July 2016 | Last Updated: October 2026

Spartan Financial Services Corp. ("SPARTAN," "we," "our," or "us") respects the privacy and confidentiality of consumers' personal information. This Privacy Notice describes how we collect, use, disclose, and protect nonpublic personal financial and health information in connection with insurance premium financing transactions and related services. This Notice applies to consumers and customers of SPARTAN in Florida, Georgia, and Texas, subject to applicable federal and state law.

WHY?

Financial companies choose how they share consumers' personal information. Federal and state laws give consumers the right to limit, some but not all sharing. Federal law also requires financial companies to explain how they collect, share, use, and protect personal information. Please read this Notice carefully to understand SPARTAN's privacy practices.

WHAT INFORMATION DO WE COLLECT?

The types of nonpublic personal information we collect depend upon your relationship and transactions with SPARTAN and may include:

- Name, mailing address, telephone number, and email address;
- Social Security number, Tax Identification Number, or other identifying information, when applicable;
- Insurance policy and premium information;
- Premium Finance Agreement and financing information;
- Account balances and payment or transaction history;
- Bank account and routing information;
- ACH authorization and electronic payment information;
- Credit or debit card payment information;
- Information received from insurance agents, agencies, brokers, general agents, insurance carriers, financial institutions, and service providers;
- Information necessary to verify or process transactions, prevent fraud, manage risk, or comply with applicable laws and regulations; and
- Health or medical information, only when obtained in connection with an insurance transaction and to the extent permitted or required by applicable law.

HOW DO WE COLLECT YOUR INFORMATION?

We collect personal information, for example, when you:

- Apply for or enter into a Premium Finance Agreement;
- Finance an insurance policy;
- Make a payment;
- Authorize an ACH or other electronic payment;
- Provide bank account or payment information;
- Communicate with us regarding your account; or
- Request account servicing or other services.

We may also receive information from other parties involved in your insurance or financing transaction, including insurance agents, agencies, brokers, general agents, insurance carriers, financial institutions, payment processors, and other service providers.

HOW DOES SPARTAN USE YOUR INFORMATION?

We may use your personal information for legitimate business, servicing, security, and regulatory purposes, including:

- Processing and servicing your Premium Finance Agreement;
- Processing authorized payments and ACH transactions;
- Maintaining and servicing your account;
- Validating or verifying bank account and payment information;
- Detecting, preventing, and investigating fraud or unauthorized transactions;
- Managing operational and financial risk;
- Processing insurance policy cancellation and reinstatement notices;
- Communicating with insurance agents, agencies, general agents, and insurance carriers as necessary to service your financing agreement;
- Responding to legal process, regulatory requests, audits, or examinations;
- Maintaining records required by applicable law;
- Protecting our rights, property, systems, customers, and business operations; and
- Complying with applicable federal and state laws, regulations, and payment network requirements.

HOW DO WE SHARE YOUR PERSONAL INFORMATION?

Financial companies may need to share consumers' personal information to conduct their everyday business. The following describes SPARTAN's practices.

Reasons We May Share Your Personal Information	Does SPARTAN Share?	Can You Limit This Sharing?
For our everyday business purposes — such as processing transactions, maintaining and servicing accounts, processing payments, responding to court orders and legal investigations, regulatory purposes, and audits	Yes	No
To process and service your Premium Finance Agreement with insurance agents, agencies, brokers, general agents, insurance carriers, financial institutions, payment processors, and service providers	Yes	No
To issue or process insurance policy cancellation, reinstatement, payment, or related servicing notices	Yes	No
For fraud prevention, account verification, security, regulatory compliance, and risk management	Yes	No
For our marketing purposes To offer our products and services to you	No	No
For joint marketing with affiliated 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 to market to you	No	We Don't Share
For nonaffiliates to market to you	No	We Don't Share

We may also disclose information when otherwise permitted or required by federal or state law.

OUR AFFILIATES

Affiliates are companies related by common ownership or control. SPARTAN does not share your nonpublic personal information with its affiliates for their marketing purposes unless permitted by applicable law and disclosed to you as required.

- United Insurance Finance Co., Inc.
- Lease Option Company, Inc.

OUR NONAFFILIATES

Nonaffiliates are companies that are not related to SPARTAN by common ownership or control. Nonaffiliates with whom we may share information as necessary to conduct our everyday business may include:

- Insurance agents, agencies, and brokers;
- General agents;
- Insurance carriers;
- Banks and other financial institutions;
- ACH and payment processors;
- Companies that provide or support our computer and information systems;
- Account verification and fraud-prevention service providers;
- Professional service providers;
- Auditors;
- Regulators and governmental authorities; and
- Other service providers performing functions on our behalf.

We do not share nonpublic personal information with nonaffiliated third parties for their independent marketing purposes.

ACH AND ELECTRONIC PAYMENT INFORMATION

When you authorize SPARTAN to initiate ACH or other electronic payments, we may collect and use bank account, routing, authorization, transaction, and related payment information. We may use this information to:

- Process authorized payments;
- Verify and validate account information;
- Prevent and detect fraud or unauthorized transactions;
- Manage payment and transaction risk;
- Process eligible returned or reinitiated transactions;
- Maintain records of payment authorizations; and
- Comply with applicable laws, regulations, banking requirements, and ACH Network Rules.

SPARTAN limits access to sensitive banking and payment information to personnel and service providers who require access to perform authorized business functions.

HOW DOES SPARTAN PROTECT MY PERSONAL INFORMATION?

To protect your personal information from unauthorized access and use, SPARTAN maintains administrative, technical, and physical safeguards designed to comply with applicable federal and state requirements. These safeguards are designed to protect sensitive financial, banking, payment, insurance, and other nonpublic personal information against unauthorized access, use, disclosure, alteration, or destruction.

Access to personal information is limited to employees and authorized service providers who need the information to perform legitimate business functions. We also require service providers handling nonpublic personal information on our behalf to maintain appropriate protections as required by applicable law and contractual obligations.

FORMER CUSTOMERS

When you are no longer a SPARTAN customer, we continue to protect and disclose your nonpublic personal information in accordance with the practices described in this Notice and as permitted or required by applicable law.

YOUR PRIVACY CHOICES

Federal and state laws provide consumers with the right to limit certain categories of information sharing. Because SPARTAN does not currently share personal information for affiliate marketing, joint marketing, or nonaffiliate marketing as described above, those categories of sharing do not presently require an opt-out election.

If SPARTAN changes its information-sharing practices in a manner that creates an applicable right to limit sharing, we will provide any notice and opportunity to exercise that right required by applicable law before implementing the change.

QUESTIONS OR PRIVACY REQUESTS

Spartan Financial Services Corp.

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Website: www.spartan-financial.com

APPLICABLE FEDERAL AND STATE PRIVACY LAWS

Federal: Gramm-Leach-Bliley Act (GLBA), Title V — 15 U.S.C. §§ 6801–6809 and applicable implementing regulations.

Florida: Florida Administrative Code — Department 69, Division 69J, Chapter 69J-128 — Privacy of Consumer Financial and Health Information.

Georgia: Georgia Code — Title 33, Chapter 39 — Collection, Use, and Disclosure of Information Gathered by Insurance Institutions; and Georgia Administrative Rules — Subject 120-2-87 — Regulations Governing the Collection, Use, and Disclosure of Information Gathered in Connection with Insurance Transactions.

Texas: Texas Administrative Code — Title 28, Part 1, Chapter 22 — Privacy, including applicable requirements concerning insurance consumer financial information and insurance consumer health information.

CHANGES TO THIS PRIVACY NOTICE

SPARTAN may revise this Privacy Notice from time to time to reflect changes in our practices, legal requirements, regulatory requirements, or business operations. When required by applicable law, we will provide consumers with a revised Privacy Notice before implementing a change that materially affects how we collect, use, or disclose nonpublic personal information.