

# PRIVACY POLICY

Quotanda LLC — United States

June 2026

This Privacy Policy applies to consumers and customers resident in the United States whose data is controlled by Quotanda LLC, a Delaware limited liability company. It has been prepared in accordance with the Financial Privacy Rule of the Gramm-Leach-Bliley Act (GLBA, 16 CFR Part 313), the Safeguards Rule (16 CFR Part 314), the California Consumer Privacy Act (CCPA/CPRA), and applicable state privacy laws.

## 1. Entity Identification

Quotanda LLC is a Delaware limited liability company that provides education financing services — including Deferred Tuition, Payment Plans and Income Share Agreements (ISAs) — to students enrolled in partner educational institutions across the United States.

For purposes of the GLBA and the CCPA, Quotanda LLC operates in a dual capacity:

<b>As Financial Institution / Business</b>	When directly managing student education financing: application assessment, contract signing, payment administration and account management. In this case, Quotanda LLC is the entity responsible for the processing of the student's personal data.
<b>As Service Provider</b>	When processing students' personal data on behalf of and under the instructions of a partner educational institution. In this case, the educational institution acts as Business under the CCPA and as Quotanda LLC's client under the GLBA. This relationship is formalised through a service agreement with each institution.

If a student wishes to exercise their rights in relation to data provided by their educational institution, they may contact either that institution or Quotanda LLC directly at [support@quotanda.com](mailto:support@quotanda.com).

When Quotanda LLC acts as Service Provider for an educational institution, the processing of students' educational records is carried out in accordance with the Family Educational Rights and Privacy Act (FERPA, 20 U.S.C. § 1232g), under the school official exception, solely under the educational institution's instructions, and without using such records for Quotanda LLC's own commercial purposes or re-disclosing them to third parties without the institution's express authorisation. The educational institution retains control over such records at all times.

<b>Legal Entity</b>	Quotanda LLC
<b>Registered Address</b>	3500 S Dupont Hwy, Dover, DE 19901-6041, United States
<b>Federal Regulator</b>	Federal Trade Commission (FTC) — under the GLBA Financial Privacy Rule (16 CFR Part 313) and the Safeguards Rule (16 CFR Part 314)

<b>Privacy Contact</b>	support@quotanda.com
<b>Website</b>	www.quotanda.com

## 2. GLBA Privacy Notice — Financial Privacy Rule

This section constitutes Quotanda LLC’s Privacy Notice under the Financial Privacy Rule of the GLBA (16 CFR Part 313), as implemented by the Federal Trade Commission. The GLBA requires Quotanda LLC to provide this notice at the start of the relationship with the consumer or customer and to explain how nonpublic personal information (NPI) is collected, shared and protected. This notice will be updated if there is any material change in the practices described herein, as required by the Financial Privacy Rule (16 CFR Part 313).

### 2.1 Distinction Between Consumer and Customer

For purposes of the GLBA, Quotanda LLC distinguishes between two categories of individuals:

- **Consumer:** any individual who requests a financial product or service from Quotanda LLC for personal, family or household use, even if the relationship is never formalised by contract. Consumers receive this notice before their nonpublic personal financial data is shared with non-affiliated third parties outside applicable legal exceptions.
- **Customer:** a consumer who has established a continuing relationship with Quotanda LLC by signing a financing contract. Customers receive this notice at the start of the relationship and, where applicable, periodically during its term.

### 2.2 Nonpublic Personal Information Collected

Quotanda LLC collects nonpublic personal information (NPI) from the following sources:

- Information provided directly by the consumer or customer: name, contact details, employment status, income level, banking information for ACH payment processing, and academic history.
- Information about transactions with Quotanda LLC: account history, payment records and financing contract details.
- Information provided by the partner educational institution: enrolment status, programme details and financing amounts.

*Quotanda LLC does not consult consumer reporting agencies or credit bureaus, and does not carry out formal KYC identity verification beyond document review.*

### 2.3 Information Shared and With Whom

The table below sets out the reasons Quotanda LLC may share the consumer’s or customer’s NPI, whether it does so, and whether the consumer or customer may limit that sharing:

Reasons Quotanda LLC may share your NPI	Do we share?	Can you limit this?
For Quotanda LLC’s everyday business purposes: processing your financing application, administering your account, responding to legal orders or investigations.	Yes	No

For Quotanda LLC's marketing purposes: to offer you new products or services.	Yes	Yes — contact us at support@quotanda.com
For joint marketing with other financial companies.	No	We don't share
For affiliates' everyday business purposes: information about your transactions.	No	We don't share
For non-affiliates to market their products and services to you.	No	We don't share

**Quotanda LLC does not sell the NPI of its consumers or customers to third parties.**

To limit the use of your data for marketing purposes, send your request to support@quotanda.com with the subject line: "Data sharing limitation — [full name]".

## 2.4 Annual Notice and FAST Act Exception

Under Section 503(f) of the GLBA, as introduced by the FAST Act of 2015, Quotanda LLC may rely on the exception to the annual notice requirement where the following conditions are simultaneously met: (i) Quotanda LLC shares NPI solely under the GLBA's legal exceptions that do not trigger the consumer's or customer's opt-out right, and (ii) Quotanda LLC's practices have not changed since the last notice provided. If either condition ceases to be met, Quotanda LLC will provide an updated notice.

## 3. Notice at the Point of Data Collection

In accordance with the CCPA and its regulations in force since January 2026, Quotanda LLC provides this notice at or before the time of personal data collection. This notice describes the categories of personal information collected and the purposes for which it is used.

### a) Identifiers and Contact Data

Full name, email address, phone number, mailing address, date of birth, and identity document number. Used for identity verification, account creation, contract administration and fraud prevention.

### b) Nonpublic Personal Information (NPI)

Income level, employment status, banking information for ACH payment processing, and payment history linked to the contract. Used for application assessment, contract administration and payment processing.

### c) Academic Information

Name of educational institution, programme, enrolment status and programme start and end dates. Provided by the student and, in part, by the partner educational institution. Used for eligibility assessment and contract administration.

### d) Employment and Income Data — Income-Linked Payment Contracts

For contracts where instalment amounts are linked to the customer's income, Quotanda LLC periodically collects and updates information on employment status, employer name, job title and income level. This data is required for instalment calculation in accordance with the contract terms.

## e) Technical and Usage Data

IP address, browser type, device information, pages visited and session data, collected automatically via cookies and similar technologies. Used for platform security, fraud detection and service improvement.

## f) Communications

Records of calls, emails and messages exchanged with the Quotanda LLC team, used for customer support, quality assurance and dispute resolution.

*Quotanda LLC does not collect biometric identifiers. Quotanda LLC does not consult consumer reporting agencies.*

## 4. Purposes of Data Processing

### 4.1 Purposes Necessary to Provide the Service

The following uses are necessary to establish and perform the contractual relationship between the customer and Quotanda LLC. The customer may not object to these uses while maintaining an active relationship with Quotanda LLC:

- Receiving, evaluating and processing the education financing application.
- Identity verification and authentication of documentation submitted.
- Assessing financing eligibility based on academic and financial information.
- Executing and administering the financing contract, including payment management and account communications.
- For income-linked payment contracts: periodically collecting and updating employment and income data to calculate instalments in accordance with the contract terms.
- Preventing and detecting fraud, money laundering and identity misuse, including verification against applicable sanctions lists.
- Managing non-payment situations, including collaboration with the partner educational institution and, where necessary, with authorised collections companies.
- Complying with Quotanda LLC's legal obligations under applicable federal and state law.
- Sending essential service communications: application status updates, payment reminders, contract changes and security alerts.

### 4.2 Optional Purposes — The Consumer or Customer May Opt Out

Quotanda LLC may also use personal data for the following additional purposes, which are not required to provide the service. The consumer or customer may opt out at any time by emailing [support@quotanda.com](mailto:support@quotanda.com):

- Sending marketing communications about new Quotanda LLC products or services.
- Conducting anonymised or pseudonymised statistical analyses or market research to improve services.

*Opting out of these uses will not affect access to the service or the customer's contractual relationship with Quotanda LLC.*

## 5. Artificial Intelligence and Technology Tools

### 5.1 Use of Technology Tools and Artificial Intelligence

Quotanda LLC uses technology tools, including AI-assisted systems, in the performance of its internal operations. In particular, Quotanda LLC uses Claude, developed by Anthropic, PBC, as a support tool for document management, internal communications and administrative workflows. In the course of these functions, such tools may process personal information to the extent that it forms part of the documents or communications being handled.

Anthropic, PBC is listed as a Service Provider in Section 7 of this Policy. Quotanda LLC has entered into a Service Provider Agreement with Anthropic governing the use and protection of information processed through its platform.

### 5.2 Human Oversight of Financing Decisions

Decisions regarding the assessment of financing applications — including eligibility determinations, contract terms and any decisions on account status — are made by Quotanda LLC personnel. None of these decisions is made solely by automated means. The technology tools used support the Quotanda LLC team, but the authority to make decisions affecting the consumer or customer rests with people at all times.

Consumers or customers resident in California and other states with equivalent regulations who wish to exercise rights in relation to the use of Automated Decision-Making Technology (ADMT) may submit their request to [support@quotanda.com](mailto:support@quotanda.com). Quotanda LLC will handle such requests in accordance with applicable regulations.

## 6. Consumer and Customer Rights by State of Residence

Depending on their state of residence, the consumer or customer may have specific rights regarding their personal data. These rights are in addition to those recognised under the GLBA and do not replace them.

In all states listed, basic rights include: access to data collected, correction, deletion, portability and objection to certain uses. Specific rights and applicability thresholds vary by state.

State	Applicable Law	In force since	Competent Authority
California	CCPA / CPRA (ADMT regulations 2026)	Jan. 2020 / 2026	California Privacy Protection Agency (CalPrivacy) — <a href="http://cppa.ca.gov">cppa.ca.gov</a>
Texas	Texas Data Privacy and Security Act (TDPSA)	Jul. 2024	Texas Attorney General
Colorado	Colorado Privacy Act (CPA)	Jul. 2023	Colorado Attorney General
Virginia	Consumer Data Protection Act (VCDPA)	Jan. 2023	Virginia Attorney General
Connecticut	Data Privacy Act (CTDPA, amended Oct. 2025)	Jul. 2023	Connecticut Attorney General
Oregon	Consumer Privacy Act (OCPA)	Jul. 2024	Oregon Attorney General
Montana	Consumer Data Privacy Act (MTCDDPA)	Oct. 2024	Montana Attorney General

<b>Delaware</b>	Personal Data Privacy Act (DPDPA)	Jan. 2025	Delaware Attorney General
<b>Iowa</b>	Consumer Data Protection Act (ICDPA)	Jan. 2025	Iowa Attorney General
<b>Nebraska</b>	Data Privacy Act (NDPA)	Jan. 2025	Nebraska Attorney General
<b>New Hampshire</b>	Data Privacy Law (NHDPL)	Jan. 2025	New Hampshire Attorney General
<b>New Jersey</b>	Data Privacy Act (NJDPDA)	Jan. 2025	New Jersey Attorney General
<b>Tennessee</b>	Information Protection Act (TIPA)	Jul. 2025	Tennessee Attorney General
<b>Minnesota</b>	Consumer Data Privacy Act (MCDPA)	Jul. 2025	Minnesota Attorney General
<b>Maryland</b>	Online Data Privacy Act (MODPA)	Oct. 2025	Maryland Attorney General
<b>Indiana</b>	Consumer Data Protection Act (INCDPA)	Jan. 2026	Indiana Attorney General
<b>Kentucky</b>	Consumer Data Protection Act (KCDPA)	Jan. 2026	Kentucky Attorney General
<b>Rhode Island</b>	Data Transparency and Privacy Protection Act	Jan. 2026	Rhode Island Attorney General
<b>Utah</b>	Consumer Privacy Act (UCPA)	Dec. 2023	Utah Attorney General
<b>Florida</b>	Digital Bill of Rights (FDBR) — applies to large companies	Jul. 2024	Florida Department of Legal Affairs

### How to exercise your rights:

Submit your request to: [support@quotanda.com](mailto:support@quotanda.com)

Include: full name, state of residence, the right you wish to exercise and sufficient information to verify your identity.

Response times: Quotanda LLC will acknowledge receipt within 10 business days and provide a complete response within 45 days. For complex requests, the period may be extended by a further 45 days with prior notice.

Quotanda LLC will not take any discriminatory action against a consumer or customer for exercising their privacy rights.

## 7. Service Providers and Third Parties

### 7.1 Sharing Necessary to Provide the Service

Quotanda LLC shares personal information with the following categories of third parties to the extent necessary to operate its business and fulfil its contractual and legal obligations:

- **transactional information on the student’s financing contract status — amounts, payments and compliance — required for programme administration. Full banking details are not shared.:** Partner educational institutions
- **companies providing infrastructure, cloud storage, communications (email and SMS), electronic contract signing, workflow management, appointment scheduling and internal**

productivity tools. All of them process personal information solely under Quotanda LLC's instructions and under service agreements imposing equivalent protection obligations.: Technology and operational Service Providers

- **AI-assisted tool used for internal document management operations. See Section 5.:** AI Service Provider
- **in the event of non-payment, identification and debt information provided to authorised companies for extrajudicial debt recovery in accordance with applicable law.:** Collections companies
- **government agencies, law enforcement or courts where Quotanda LLC is legally required to provide information or where necessary to prevent, detect or investigate unlawful activities.:** Legal and regulatory authorities
- **in the event of a merger, acquisition or asset transfer, data may be transferred to the acquiring entity to ensure service continuity.:** Successor entities

## 7.2 Sharing Requiring Consent

Quotanda LLC does not share personal information with commercial partners for marketing or advertising purposes without the consumer's or customer's prior express consent. Consent may be withdrawn at any time by contacting support@quotanda.com.

**Quotanda LLC does not sell personal information to third parties. Quotanda LLC does not share personal information with third parties for cross-context behavioral advertising. This statement applies to all consumers and customers, including California residents under the CCPA.**

## 8. Security — Safeguards Rule

In accordance with the GLBA Safeguards Rule (16 CFR Part 314), Quotanda LLC maintains a Written Information Security Program (WISP) designed to protect the NPI of its consumers and customers. The program includes the administrative, technical and physical safeguards required by the FTC, including:

- Designation of a Qualified Individual to oversee the information security program.
- Encryption of data in transit using SSL/TLS and of data at rest on secure platforms.
- Access controls restricting data processing to authorised personnel.
- Audit logging to track changes to personal data and maintain traceability.
- Service Provider Agreements with all providers that access personal information.
- Periodic risk assessments and program updates.

### Security Incident Notification

In the event of a security incident affecting the information of 500 or more consumers or customers, Quotanda LLC will notify the Federal Trade Commission (FTC) within a maximum of 30 days of discovering the incident, in accordance with the amendment to the Safeguards Rule of October 2023 (in force since May 2024). In addition, where required by applicable state law, Quotanda LLC will notify affected consumers or customers within the deadlines established by that law.

## 9. Data Retention

Quotanda LLC retains personal information for the periods set out below, or for a longer period where required by applicable federal or state law.

Category	Retention Period
<b>Active customer — financing contract in effect</b>	Duration of the contract plus 36 months from final payment or contract closure.
<b>Rejected application</b>	5 years from the date of rejection, in compliance with AML and recordkeeping requirements.
<b>Consumer who abandoned the process</b>	5 years from the date the application lapsed due to inactivity (90 days).
<b>Registered user without an active contract</b>	36 months from the date of registration.
<b>AML and financial crime compliance records</b>	5 to 7 years from account closure, in compliance with applicable federal and state requirements.
<b>Data deletion request received</b>	Data will be restricted and deleted upon expiry of mandatory retention periods. Certain data cannot be deleted while legally required retention periods apply.

Upon expiry of applicable retention periods, data is securely and irreversibly deleted or anonymised so that it can no longer identify the consumer or customer.

## 10. Cookies and Tracking Technologies

Quotanda LLC uses cookies and similar tracking technologies on its website and applicant portal. For full details on the types of cookies used, their purpose, and how to manage or disable them, please see Quotanda LLC's Cookie Policy at [www.quotanda.com/cookies](http://www.quotanda.com/cookies).

Residents of California and other states with equivalent regulations may use the Global Privacy Control (GPC) signal to opt out of the sale or sharing of personal data. Quotanda LLC honours GPC signals received from the consumer's or customer's browser.

## 11. Children's Privacy

Quotanda LLC's services are directed to individuals aged 18 and over. Quotanda LLC does not knowingly collect personal data from children under 13. If it becomes apparent that data from a child under 13 has been inadvertently collected, Quotanda LLC will delete it immediately. Anyone aware of such a circumstance should notify [support@quotanda.com](mailto:support@quotanda.com).

## 12. Changes to This Privacy Policy

Quotanda LLC may update this Privacy Policy to reflect regulatory, legal or business practice changes. The current version will always be available at [www.quotanda.com/privacy](http://www.quotanda.com/privacy). Where changes materially

affect the consumer’s or customer’s privacy rights, Quotanda LLC will notify such changes by email or through the portal before they take effect.

### 13. Contact and Complaints


Enquiries, requests to exercise rights and complaints regarding this Privacy Policy should be addressed to:

**Quotanda LLC — Privacy Department**  
[support@quotanda.com](mailto:support@quotanda.com)  
3500 S Dupont Hwy, Dover, DE 19901-6041, United States  
*Quotanda LLC will acknowledge receipt of all privacy requests within 10 business days.*  
California residents who are not satisfied with Quotanda LLC’s response may lodge a complaint with the California Privacy Protection Agency (CalPrivacy) at [coppa.ca.gov](http://coppa.ca.gov). Residents of other states may contact their state Attorney General or the applicable data protection authority. Federal complaints relating to financial practices may be submitted to the Federal Trade Commission (FTC) at [ftc.gov](http://ftc.gov). Consumers or customers wishing to lodge a complaint relating to education financing products — including Income Share Agreements, Deferred Tuition or Payment Plans — may also contact the Consumer Financial Protection Bureau (CFPB) at [consumerfinance.gov](http://consumerfinance.gov), which has enforcement authority over originators of private education loans under the Truth in Lending Act (TILA) and Regulation Z.

## WEB

### PRIVACY SUMMARY

Quotanda LLC — United States · June 2026 · DRAFT FOR INTERNAL REVIEW

 This document is a summary of Quotanda LLC’s Privacy Policy. It contains essential information on the processing of personal data and financial information. For full details, retention periods, international transfers and complete terms, please see the full Privacy Policy at [www.quotanda.com/privacy](http://www.quotanda.com/privacy).

#### 1. Who is Quotanda LLC?

<b>Legal Entity</b>	Quotanda LLC — Delaware limited liability company, United States
<b>Services</b>	Education financing: Deferred Tuition, Payment Plans and Income Share Agreements (ISAs)
<b>Federal Regulator</b>	Federal Trade Commission (FTC) — under GLBA (16 CFR Parts 313 and 314)
<b>Contact</b>	<a href="mailto:support@quotanda.com">support@quotanda.com</a> · <a href="http://www.quotanda.com">www.quotanda.com</a>

Quotanda LLC acts as the responsible entity when directly managing student financing. When providing technology services to an educational institution, it acts as Service Provider under that institution’s instructions.

### 2. What information do we collect?

Quotanda LLC collects the following categories of personal information and nonpublic personal information (NPI) under the GLBA:

Category	What it includes
<b>Identifiers and contact</b>	Name, email, phone, mailing address, date of birth, identity document number.
<b>Financial information (NPI)</b>	Income level, employment status, banking information for ACH payments and contract payment history.
<b>Academic information</b>	Educational institution, programme, enrolment status and programme dates.
<b>Employment and income data</b>	For income-linked payment contracts: employer, job title, income level. Updated periodically during the contract term.
<b>Technical and usage data</b>	IP address, browser, device and session data collected automatically.
<b>Communications</b>	Records of calls, emails and messages with the Quotanda LLC team.

*Quotanda LLC does not consult consumer reporting agencies (credit bureaus) and does not carry out formal KYC verification.*

### 3. Why do we use your information?

**Purposes necessary for the service — the consumer or customer may not opt out while maintaining an active relationship with Quotanda LLC:**

- Assessment and processing of the education financing application.
- Identity verification and document authentication.
- Contract administration: payment management, communications and account monitoring.
- Instalment calculation for income-linked payment contracts.
- Fraud prevention and verification against applicable sanctions lists.
- Default management and, where necessary, collaboration with authorised collections companies.
- Compliance with federal and state legal obligations.
- Sending essential service communications.

**Optional purposes — the consumer or customer may opt out at any time:**

- Marketing communications about new Quotanda LLC products or services.

- Statistical analyses with anonymised data to improve the service.

To opt out: [support@quotanda.com](mailto:support@quotanda.com) · Subject: "Data use limitation — [full name]"

#### 4. With whom do we share your information? (GLBA Notice)

Under the Gramm-Leach-Bliley Act (GLBA), Quotanda LLC discloses the reasons it may share your nonpublic personal information (NPI):

Reason for sharing	Do we share?	Can you limit this?
Everyday business: processing your application, administering your account and legal compliance.	Yes	No
Quotanda LLC marketing: offering you new products or services.	Yes	Yes — <a href="mailto:support@quotanda.com">support@quotanda.com</a>
Joint marketing with other financial companies.	No	We don't share
Affiliates' everyday operations.	No	We don't share
Non-affiliates for their own marketing purposes.	No	We don't share

**Quotanda LLC does not sell personal information or share it for cross-context behavioral advertising.**

#### 5. Artificial Intelligence and Financing Decisions

Quotanda LLC uses AI-assisted technology tools for internal document management operations. All decisions regarding the assessment of financing applications are made by Quotanda LLC personnel. No automated system alone determines whether an application is approved or rejected.

California residents may request information about the use of automated tools and exercise their rights under the CCPA's ADMT regulations at [support@quotanda.com](mailto:support@quotanda.com).

#### 6. Your Rights

Depending on your state of residence, you may have the following rights regarding your personal data:

Right	What it allows
<b>Access</b>	Know what information Quotanda LLC holds about you and how it is used.
<b>Correction</b>	Request correction of inaccurate or out-of-date data.
<b>Deletion</b>	Request deletion of your data, subject to legal retention obligations.
<b>Portability</b>	Obtain a copy of your data in structured format.
<b>Opt-out</b>	Object to the sale or sharing of your data and to its use for marketing.

<b>Non-discrimination</b>	Quotanda LLC will not take discriminatory action for the exercise of these rights.
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**How to exercise your rights:**  
 Send your request to support@quotanda.com indicating your full name, state of residence and the right you wish to exercise.  
 Quotanda LLC will acknowledge receipt within 10 business days and provide a complete response within 45 days.

## 7. Security

Quotanda LLC maintains a Written Information Security Program (WISP) under the GLBA Safeguards Rule (16 CFR Part 314), which includes data encryption in transit and at rest, access controls and audit logging. In the event of a security incident affecting 500 or more consumers or customers, Quotanda LLC will notify the FTC within 30 days.

## 8. Complaint Authorities

Authority	Scope	Contact
<b>Federal Trade Commission (FTC)</b>	GLBA regulator — non-bank financial practices	ftc.gov
<b>Consumer Financial Protection Bureau (CFPB)</b>	Enforcement over education financing products (ISAs, TILA / Regulation Z)	consumerfinance.gov
<b>California Privacy Protection Agency (CalPrivacy)</b>	CCPA/CPRA rights — California residents	cppa.ca.gov
<b>Your state Attorney General</b>	Applicable state privacy laws (20 states with active legislation)	See full policy — Section 6

**This document is a summary. The full Privacy Policy contains detailed information on:**

- Retention periods by category of user.
- Specific rights by state of residence (20 states with active legislation).
- Full list of Service Providers and security measures.
- Complete GLBA Notice under the Financial Privacy Rule (16 CFR Part 313).
- Rights under FERPA when Quotanda LLC acts as Service Provider for an educational institution.
- Rights under TILA / Regulation Z for education financing products.

**Full Privacy Policy: [www.quotanda.com/privacy](http://www.quotanda.com/privacy)**