

Privacy Statement – United States and Canada

This Privacy Statement (“**Privacy Statement**”) focuses on the collection, use and disclosure of your personal information by Huntington Distribution Finance, Inc., Huntington Commercial Finance Canada, Inc. and Red Iron Acceptance, LLC (collectively, “**North American Inventory Finance Companies**”).

A. General. This Privacy Statement describes our privacy practices for our applicants and customers in the United States and Canada, as well as visitors to our website and other individuals who contact or interact with us. Although all transactions with the North American Inventory Finance Companies are solely for business or commercial purposes, we respect your concern about privacy and we have implemented certain procedures with regard to personal information which may be collected on this website or in connection with business transactions, such as personal information relating to individuals who do business as a sole proprietorship or general partnership without a partnership agreement and individual principals, beneficial owners, guarantors and other representatives of our customers. In this Privacy Statement, the words “you” and “your” refer to such individuals and the words “we,” “us” and “our” refer to the North American Inventory Finance Companies, and, as applicable, their affiliates.

For Residents of California (and other jurisdictions): We do not sell your personal information to other parties for them to use for their own purposes. Any personal information that we provide to other parties is subject to restrictions on use contained in written contracts or agreements or industry practice. We do not collect, use, or sell your personal information for direct marketing or behavioral advertising purposes.

B. Types of Personal Information We Collect. We only collect personal information about you that is related to establishing, managing and maintaining our business relationship with you or your business. Failure to provide this information may result in North American Inventory Finance Companies being unable to provide or continue to provide the services required by your business. Personal information that is collected may include, but is not restricted to, identification information such as your first and last name, your date of birth, your social security number or social insurance number, your home address, your telephone number and your email address.

C. Why We Collect Your Personal Information. The reasons we collect your personal information may include, but are not limited to, the following purposes: identifying you, assessing your creditworthiness, providing you with ongoing services, notifying you of changes to services or systems, improving our products and services and informing you of products and services that may interest you. We will request your consent at the time of collection unless consent is implied or applicable law permits collection without consent. When you grant your consent, we will collect, use, and disclose your information for the purposes described in this section in order to provide or maintain requested financial services.

D. How We Collect Your Personal Information. Generally, we obtain your personal information directly from you or your business. We may rely on representations from your business that it has provided notice to you and obtained your consent, unless collection without consent is permitted under applicable law. We may also collect personal information about you from outside sources with your consent or, if the law so authorizes, without your consent.

E. Period for Which We Retain Your Personal Information. Your consent to the collection, use, communication and disclosure of personal information is valid for the length of time

necessary for the North American Inventory Finance Companies to fulfill the purposes for which the information was obtained and any additional periods as required or permitted by law.

F. When You Want Information. If you visit this website or otherwise contact us and request information about the North American Inventory Finance Companies, the products and services we offer or the products and services that we provide to you, we may collect the information we believe is necessary to respond to your request. You may also submit other information and, when you do, we may collect that information.

G. Information From Third Parties. You agree that we may also collect information about you from outside sources including, without limitation, credit bureaus, your other creditors and public bodies for the purposes of confirming information about you, supplementing our data on particular attributes or determining your eligibility for products and services that we may offer you. If required and permitted by law, upon your request we will let you know if a credit report was obtained and provide the name and address of the credit bureau that issued the report. Many jurisdictions give individuals the right to correct inaccurate information in the files of credit bureaus.

H. Sharing Your Information When Permitted or Required by Federal, State or Provincial Law or Agreement. You agree that, by submitting your information to us, we may share your information with other parties such as affiliates, manufacturers, distributors, service providers or other third parties when necessary or pertinent for the operation of our business or when permitted or required by federal, state or provincial law or when permitted under any separate agreement with you. For example, we share information as permitted by law in order to protect against fraud, report transactions to consumer reporting agencies and other credit bureaus, protect and defend the rights or property of the North American Inventory Finance Companies, act in urgent circumstances to protect the personal safety of our applicants, customers, our employees or the public, respond to subpoenas, to comply with a legal obligation or in response to a request from public authorities or self-regulatory bodies to which we are subject and which we reasonably determine requires compliance and when you ask or permit us to do so. If at some point our business or a segment of our business that uses your information is to undergo a fundamental change, such as any actual or proposed sale, financing, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets, we may also share your information on a confidential basis with potential transaction counterparties and their professional advisors as necessary for their due diligence purposes and will transfer your information to them on completion of the transaction, if required.

Given that we may share your personal information with our affiliates and third parties located in various countries, your personal information may be collected, used, processed, stored or disclosed outside of your jurisdiction of residence. As such, your personal information may potentially be accessible to law enforcement and national security authorities of another jurisdiction where local laws provide for a different level of protection for personal information. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security agencies in those other countries may be entitled to access your personal information.

For Residents of Alberta, Canada: If you would like further information about our policies and practices regarding the third parties (including our service providers) with whom we disclose your personal information and how these third parties collect, use, disclose and store personal information, please contact our Privacy Officer using the contact details below. By providing your personal information to us, you consent to our disclosure of this information to our service providers (and other third parties) as described

in this Privacy Statement, including those that may be located outside of your jurisdiction of residence.

I. Sharing Aggregated or Anonymous Data. We may share your information with other parties if we first take steps to aggregate your information with information of other users or third parties; or we otherwise remove any personal information. For example, we may aggregate the information of all persons in a particular geographic location in order to share information about the North American Inventory Finance Companies in that location. However, we do not guarantee that the recipients of this information will be unable to re-identify when the information we provide is combined with other information not provided by us.

J. Employee Access to Customer Information. We restrict access to personal information about you to those employees who need to know that information to perform their job at the North American Inventory Finance Companies. Our employees are trained to treat your information on a confidential basis, to respect customer's privacy rights and to access customer information only when they have a business reason to know the information.

K. Safeguarding and Managing Information. We maintain reasonable and appropriate physical, electronic and procedural safeguards to guard your personal information. Nevertheless, data, including e-mail and electronic communications using the internet, network communications facilities, telephone or any other electronic means may be accessed by unauthorized third parties when communicated by you over such telecommunications facilities. By transmitting data to us using such means, you agree that the North American Inventory Finance Companies are not responsible or liable for any such unauthorized third-party access.

L. Contacting Us – The North American Inventory Finance Companies. We oversee our compliance with this Privacy Statement and the law. You may contact us about questions regarding this Privacy Statement either at:

Email: HDFPrivacy@huntington.com; or

Mailing Address: Huntington Distribution Finance, Inc., PO Box 59376, Schaumburg, IL 60159.
Attention: Privacy Officer

M. Modifications. If any provision of this Privacy Statement is determined to be unenforceable or invalid, such determination shall not affect the validity or enforceability of the remaining provisions. We may delete, change, add to or otherwise amend this Privacy Statement at any time. The most current version of this Privacy Statement will always be posted on this website. Your access to or use of this website after the date any amended terms are posted shall be deemed to constitute acceptance of such amended terms. While this Privacy Statement describes how we treat your personal information, please be aware that additional terms and conditions may apply for certain parts of our website and applications.