

Privacy Policy

Effective Date: 12/15/2016

This policy describes how LendingClub collects, aggregates, and uses the information provided by you through our website, www.lendingclub.com, as well as information collected offline. We take your privacy and the security of your information seriously. This policy explains:

- What information we collect and aggregate, and how we use it
- Choices you can make about the way your information is collected, aggregated, and used
- How we protect personal information electronically and physically

This policy is incorporated into and a material term of your registration and/or use of LendingClub's products and services, including our website, www.lendingclub.com.

Go to:

- [Privacy Notice](#)
- [Security Notice](#)
- [Online Privacy Notice](#)

Privacy Notice

Effective Date: 12/15/2016

What does LendingClub do with your personal information?

FACTS

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do

What? The types of personal information we collect and share depend on the product or service you have or access through us. This information can include:

- Social Security number
- Credit history and credit scores
- Income and employment information
- Wire transfer instructions

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons LendingClub chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does LendingClub share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes-to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes -information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes -information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

- Call 888-596-3157
- Contact us at privacy@lendingclub.com

To limit our sharing

Please note:

If you are a new customer, we can begin sharing your information 30 days from the date we provided this notice. When you are no longer our customer, we continue to share your information as described in this notice.

Questions?

Email us at privacy@lendingclub.com or call 888-596-3157.

Who we are

Who is providing this notice?

LendingClub Corporation

What we do

How does LendingClub protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does LendingClub collect my personal information?

We collect your personal information, for example, when you

- Open an account
- Give us your contact information
- Give us your income information
- Show your government-issued ID
- Buy securities from us

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- Sharing for affiliates' everyday business purposes-information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates companies to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account - unless you tell us otherwise.

Definitions

- Affiliates**
- Companies related by common ownership or control. They can be financial and nonfinancial companies.
- Our affiliates include Springstone Financial, LLC; LC Advisors, LLC; and RV MP Fund GP, LLC.
- Nonaffiliates**
- Companies not related by common ownership or control. They can be financial and nonfinancial companies.
- Nonaffiliates with whom we share can include other financial services companies, lenders, insurance companies, retailers, membership clubs, or other consumer service providers.
- Joint marketing**
- A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
- Our joint marketing partners include other financial services companies, banks, lenders, insurance companies, or other consumer service providers.

Other important information

Telephone communications

For quality assurance purposes, we and our authorized partners may monitor or record all telephone communications.

For California residents

We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account. We will limit sharing within our corporate family to the extent required by California law.

For Vermont residents

We will not share information we collect about you with nonaffiliated third parties, except as permitted by Vermont law, such as to process your transactions or to maintain your account. We will not share information about your creditworthiness within our corporate family except with your authorization, but we may share information about our transactions or experiences with you within our corporate family without your consent.

For Nevada residents

We provide you this notice under Nevada state law. You may be placed on our internal Do-Not-Call List by calling us at 888-596-3157, emailing us at privacy@lendingclub.com, or writing us at:
LendingClub Corporation
Attn: Compliance Department
71 Stevenson Street, Suite 300
San Francisco, CA 94105 Nevada law also requires us to provide you the following to obtain additional information:
Office of the Attorney General
100 North Carson Street
Carson City, NV 89701
Telephone: 775-684-1100
Email: AgInfo@ag.state.nev.us.

Security Notice

How does LendingClub protect your personal information?

FACTS

Why? As a financial services company, LendingClub understands that the information collected and shared with us by our borrowers and investors contains highly sensitive data with the potential to cause significant harm if it falls in the wrong hands. We take our role in safeguarding your information seriously.

What? We maintain a comprehensive security program based on industry standards and best practices. We take a defensive, in-depth approach to implementing rigorous physical, administrative, and technical safeguards to ensure your information is safe from unauthorized access or misuse. The safeguards include preventive, detective, and corrective controls.

How? Physical safeguards like access badges and a video monitoring system protect LendingClub from unauthorized access. Administrative safeguards like a security training program, employment background checks, and access controls ensure that your information is accessed only by trained and trusted staff based on business needs to provide services to you. Technical safeguards like perimeter security, industry standard encryption, two-factor authentication, and continuous monitoring ensure that your information is protected with layered and complementary controls. We review and adjust security safeguards periodically based on ongoing risk assessment. However, despite our substantial investment in protecting your personal information, ultimately no institution can guarantee its absolute security.

Methods of protecting your personal information

Encryption & website certificates	Industry standard encryption protects the information you share with us from the moment it leaves your computer until it reaches our systems. Look for the secure locked padlock on your browser, which means you are using a secure web connection. Consult your web browser documentation for more information.
Session time-outs	We employ session time-outs to protect your account. You will be logged out of the website automatically after a period of inactivity. This reduces the risk of others being able to access your account if you leave your computer unattended.
Passwords	You should never share your password with anyone. Your password is not known to any LendingClub employee or third party, and we will never ask for your password by phone or email. If you ever receive a communication claiming to be from LendingClub that asks for your password, you should immediately report it by contacting us at security@lendingclub.com .
Identity theft protection	We have developed and implemented an identity theft prevention and response program that is designed to detect, prevent, and mitigate identity theft when borrowing or investing through the LendingClub platform. We utilize authentication technology to verify the identities of our investors and borrowers, and have established processes, procedures, and training for LendingClub employees to identify and respond appropriately to identity theft red flags. Under our agreements with investors, we are obligated to repurchase loans in cases of confirmed borrower identity theft. Additionally, we will work with law enforcement authorities as appropriate to track down and prosecute anyone who has committed identity theft on the LendingClub platform.

Disclosure of Information

Service providers

We work with a number of service providers who support our operations, including but not limited to, credit bureaus, collection agencies, electronic payment service providers, customer support call centers, and other nonaffiliated third parties. We share information with these third parties only to the extent necessary for us to process the transactions you initiate or to perform other specific services, like collections or identity verification. Our service providers are legally required to keep your information private and secure and adhere to applicable state and federal laws and regulations.

Third-party websites and services

Additionally, we may provide you with links to third-party websites and services. Those websites and services will have different security and privacy practices, so you should review them when visiting a third-party website or using a third-party service. LendingClub is ultimately not responsible for the information practices employed by sites or services linked to or from our website. In most cases, we provide those links as a way to obtain information on products and topics that may be useful to you.

Questions?

Contact us at security@lendingclub.com.

Other important information

Correcting or deleting information

Upon written request, LendingClub will provide you with information about whether we hold any of your personal information. You can access your personal information (such as name, email address, and mailing address) that we collect online and maintain by visiting your profile in your Account Summary on our website. This section of the website is password-protected to better safeguard your information. As a registered user, you can update your password, email address, physical address, phone number, and bank account information at any time on the website, and if you need to change any other information in your profile, you can contact us at support@lendingclub.com. We will respond to your request within a reasonable timeframe. Due to the regulated nature of our industry, we are under legal requirements to retain data and are generally not able to delete consumer transactional data upon request. Certain regulations issued by state and/or federal government agencies may require us to maintain and report demographic information on the collective activities of our membership. We may also be required to maintain your personal information for at least seven years to be in compliance with applicable federal and state laws regarding recordkeeping, reporting, and audits. You may sign up to receive newsletter or other communications from us. If you would like to discontinue receiving this information, you may update your email preferences by using the **Unsubscribe** link found in emails we send to you or by contacting us at privacy@lendingclub.com.

Law enforcement or other government sharing

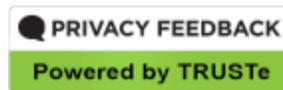
We may share your information with law enforcement or other government agencies as required by law. For example, to comply with a subpoena; respond to lawful requests by public authorities, including to meet national security or law enforcement requirements, judicial proceedings, court order, bankruptcy proceedings, or similar legal process; or for the purposes of limiting fraud.

Other important information

Privacy dispute resolution

If you have a privacy or data use concern, please contact us first at privacy@lendingclub.com.

If we have not addressed your privacy or data use concern satisfactorily, please contact our U.S.-based, privacy and data usage third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.



Social media widgets

Our website includes social media features, such as the Facebook Like button. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

Online Privacy Notice

How does LendingClub utilize web-related information collection?

FACTS

Why? We and our partners use technologies such as cookies or similar technologies. As is true of most websites, we also gather certain information automatically and store it in log files. We may combine this automatically collected log information with other information we collect about you. We use this technology to analyze trends, administer our website, track users' movements around the website, and gather demographic information about our user base as a whole. We do this to improve services we offer you, to improve analytics, and to enhance website functionality.

What? Log file information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring and exit pages, operating system, date and time stamp, and/or clickstream data. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

How? We may combine log file information with other information we collect about you.

To limit advertisement data collection We may partner with third-party ad networks to either display advertising on our website or to manage our advertising on other websites. Our ad network partners use cookies and beacons to collect non-personally identifiable information about your activities on this and other websites to provide you or others targeted advertising based upon your interests.

To opt out

If you wish to not have this information used for the purpose of serving you targeted ads, you may opt out by clicking [here](#). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

Other important information

We may also collect from you the following personal information about your contacts:

Referral activities

- Email address in order to refer our products or services
- Through our "import contacts" feature, we may collect the email address of your contacts to refer our products or services

When you provide us with personal information about your contacts, we will use this information only for the specific reason for which it is provided.

By registering and/or using LendingClub's products and services, including our website, www.lendingclub.com, you expressly authorize and consent to LendingClub's collection, aggregation, and use of your information as set forth herein. This includes LendingClub's aggregation and use of your personal information for future marketing purposes, such as determining your current and future eligibility for products and services and continued verification of your eligibility for participation in any program offered by LendingClub or one of its marketing partners, now or in the future.