

CALIFORNIA PRIVACY POLICY

Effective: 7/1/2021

Updated: 9/22/2021

This California Privacy Policy (“CA Policy”) supplements the information in our Privacy Policy and applies to individual residents of California (“Consumers” or “You”).

This CA Policy explains how and why we collect, share, store, and use the personal information of California residents under The California Consumer Privacy Act (“CCPA”).

PERSONAL INFORMATION

“Personal Information” means information that identifies, relates to, describes, is reasonable capable of being associated with or could reasonably be linked with a particular household or consumer.

Personal Information mean information that identifies, describes, relates to, or can reasonably be linked to individual consumer or household.

Under this CA Policy, Personal Information does not include:

- Publicly available information from government records.
- Deidentified, aggregated or information that is maintained in a form that is not reasonably capable of being associated with or linked to you.
- Information excluded from the CCPA’s scope, such as information covered by certain sector-specific privacy laws, including the Gramm-Leach-Bliley Act (“GLBA”).
- Information relating to job applicants, employees, contractors, and any other of our personnel.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

Categories of Personal Information	Examples	Does the Company collect this Category of Information?	Categories of Sources from which the Information was Collected	Business Purpose
Identifiers	a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport	YES	Consumer	To provide our Services, to contact you as requested, and to

	number, or other similar identifiers			otherwise market to you
Personal Information Categories listed in the California Customer Records Statute	Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES	Consumer	To provide our Services, to contact you as requested, and to otherwise market to you
Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, veteran or military status, genetic information	NO	N/A	N/A
Commercial Information	records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	NO	N/A	N/A
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, gait, or other physical patterns, and sleep, health, or exercise data	NO	N/A	N/A
Internet or other electronic network activity information	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	YES	Consumer directly (through your	To provide our Services and to

			browser or device)	market to you
Geolocation data	Your general location or more precise location to the extent permitted by law	YES	Consumer directly (through your browser or device)	To provide our Services and to market to you
Sensory Information	Audio, electronic, visual, thermal, olfactory, or similar information	NO	N/A	N/A
Professional or employment-related information	Current or past job history or performance evaluations	NO	N/A	N/A
Education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	NO	N/A	N/A
Inferences drawn from any of the information identified above. to create a profile about a consumer reflecting the consumer's preferences.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	NO	N/A	N/A

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection laws, we can only use your information if we have a proper reason for doing so such as:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Filo Mortgage L.L.C.	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes	To comply with our legal and regulatory obligations
Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Marketing our service to existing and former customers	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

DISCLOSURE AND SALE OF PERSONAL INFORMATION

In the last 12 months, we have not sold personal information about you, but we have disclosed for a business purpose the following categories of personal information, which reference the categories of personal information described above:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Internet or other similar network activity
- Geolocation data

The categories of third parties to whom we have disclosed personal information for a business purpose may include:

- Our Affiliate
- Servicers Providers processing personal information on our behalf.

For more information on how we disclose personal information, please refer to our Online Privacy Policy.

CALIFORNIA PRIVACY RIGHTS

The CCPA provides certain consumers the following rights in relation to their personal information (subject to certain limitations at law):

Right to Know: Consumers have the right to request any or all of the following information relating to their personal information collected or disclosed in the last 12 months, upon verification of their identity:

- The specific pieces of personal information collected about them;
- The categories of personal information collected about them;
- The categories of sources of the personal information collected about them;
- The categories of their personal information disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
- The categories of their personal information sold (if any), and the categories of third parties to whom this information was sold; and
- The business or commercial purposes for collecting or, if applicable, selling their personal information.

Right to Deletion: Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and

- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Consumers also have the right to be free from discrimination for exercising their rights under the CCPA. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may charge a different price or rate or services]to you, if that difference is reasonably related to the value provided to our business by your personal information.

Please note, if you have not inquired about, applied for, or obtained a financial product or service from us, we do not accept Right to Know or Right to Deletion requests because we do not maintain sufficient information to be able to match the information you could provide and verify your identity to the degree of certainty required to process your request.

If you have inquired about, applied for, or obtained a financial product or service from us, we provide specific disclosures and rights applicable to you in a separate notice available [here](#). We do not maintain personal information about you that is not subject to this separate notice (such as general internet or other similar network activity) in a form that could reasonably be connected to you. As a result, we do not otherwise accept Right to Know or Right to Deletion requests under the CCPA at this time.

If you have any questions about this policy or the rights described above, please contact us as set forth in the Contact Us section below.

UPDATES TO THIS POLICY

We will update this CA Policy from time to time. When we make changes to this CA Policy, we will change the date at the beginning of this CA Policy. All changes shall be effective from the date of publication unless otherwise provided.

HOW TO EXERCISE YOUR RIGHTS

If you would like to exercise any of your rights as described in this Privacy Policy, please:

Email us:

escalations@filomortgage.com

Call us, toll-free:

1-800-951-4732 and select Option 2; or

Write to us:

Compliance Department

FILO Mortgage LLC

500 Office Center Drive

Ste. 400

Fort Washington, PA 19034

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by [website/email/phone/in writing], you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

ONLINE CALIFORNIA CONSUMER PROTECTION ACT

Any information you provide is used by Filo Mortgage L.L.C. We do not sell your personal information to other parties. As we are a financial institution, any personal identifying information submitted to us here will be used for the purpose of determining whether you may qualify for a financial product that suits your individual needs, and for communicating with you or advertising to you now or in the future, with the hope of presenting you with financial products that may fit your needs. Please see our privacy notice for additional details.