

# Online Privacy Policy

Last Updated: February 2021

This Online Privacy Policy (“Policy”) is provided by The Change Company (“Change,” “we,” “us” and “our”) and applies to all Internet websites we operate or through which we collect personal information. This policy explains what personal information we collect, use, sell, and share about individuals (“you” and “your”) who visit or use our website and any other The Change Company-branded websites, social media sites, or mobile apps that link to or reference this Policy (collectively, our “Sites”), as well as outside our Sites. We will not collect additional categories of personal information about you, and we will not use your personal information for additional purposes, except as set forth below or in our Consumer Privacy Notice (if applicable), without first notifying you.

Please be aware that we do business in the United States only and that our Sites are intended for United States audiences only. Any information you enter through any of our Sites will be processed in the United States.

## Personal Information We Collect

As used in this Policy, “personal information” includes any information that identifies, relates to or can be linked to individuals or their households.

However, personal information does not include publicly-available information

or information that is de-identified or aggregated such that it cannot be linked to a specific individual or household.

We may collect the following categories of personal information when you apply for a product or service from us, for example, when you click the Apply Now button on our website, and otherwise:

- **Identifying information**, including, for example, your full name, addresses, phone numbers, email addresses, date of birth, Social Security number, government-issued identification number, permanent residency status, your signature, account numbers, security questions, user name and password.
- **Financial information**, such as your occupation, employment history, self-employment, income, debts, taxes, living expenses, credit score, credit history, whether you rent or own your home, bank accounts, investments, real property and other assets.
- **Commercial information**. This includes information about products or services you request or obtain through us, such as loan amount and terms, credit decision, property address, payment history, loan status and loan number.
- **Protected classifications** under California and federal law, such as your race, ethnicity, sex, marital status and age.
- **Audio, electronic and visual information**, including telephone messages, recorded conversations (with your consent), information submitted electronically via our online loan application, electronic signature, and your photo identification.
- **Education**. For example, the number of years of education you completed.

- **Inferences drawn from any of the above information.** Inferences drawn about you, such as your creditworthiness, ability to repay a loan, and likelihood of obtaining a loan in the future.

We do not collect biometric information (except for protected classifications, above); internet or other electronic network activity; geolocation data; thermal, olfactory or similar information about you.

## Sources of Personal Information

We collect personal information from the following sources, as permitted by law:

- **You and your agents**, such as your mortgage broker or real estate agent, when you inquire about, obtain or request a product or service from us, whether collected through our online loan application or offline.
- **Verification sources** who can verify information in connection with your loan application, including your current or past employers, landlords, mortgage lenders, banks and financial institutions.
- **Government authorities**, such as the Internal Revenue Service (IRS) and Social Security Administration (SSA).
- **Consumer reporting agencies**, such as credit bureaus, pursuant to the federal Fair Credit Report Act (FCRA).
- **Service providers** that perform services for us pursuant to a written contract, such real estate appraisers, identity verification services, information verification services, title companies, insurers, closing agents, attorneys, marketing services, loan servicers, quality control auditors, financial institutions, mortgage brokers, and data resellers.

- **“Lead” sources**, including individuals, businesses, and commercially-available third-party sources who may provide us with information about prospective customers, or “leads.”
- **Experience, observation or evaluation.** We may collect certain personal information based on our visual observation, our experiences with you, or based on personal information we collect.

## How We Use Personal Information

We use the personal information we collect about you for the following business purposes, as permitted by law:

- To verify your identity and to respond to your requests for information.
- To process, provide and communicate with you about products or services you request or obtain from us.
- To service, administer or enforce a product or service you obtain from us.
- To obtain or verify insurance or to process insurance claims as an insured or loss payee.
- To respond to customer complaints.
- For government monitoring and reporting purposes, as required by federal or state law.
- To advertise or offer products, services and promotional campaigns to you.
- In connection with secondary market transactions involving your loan with us, including due diligence and audits.
- To improve your experience with us and our products and services, for example, to conduct customer surveys.

- To apply for and maintain government approvals, for example, for government programs, licenses or certifications.
- To comply with the law or legal process, including a civil, criminal, or regulatory inquiry, investigation or subpoena.
- To cooperate with law enforcement agencies concerning suspected illegal conduct or activity.
- To exercise or defend legal claims.
- As reasonably necessary for our operational purposes, or those of our service providers, such as to perform auditing and quality control; market research; product research and development; detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; debug to identify and repair errors in data or functionality; provide customer service; verify customer information; process payments; obtain warehouse financing and other funding; provide marketing services.
- For any other purposes that we disclose to you before or at the time we collect your personal information.
- For any other purposes that we disclose to you before or at the time we collect your personal information.

## **Third Parties to Whom We Sell**

We do not sell your personal information to third parties.

## **Third Parties to Whom We Disclose**

We share personal information we collect with the following categories of third parties for business or commercial purposes, as permitted by law:

- **Service Providers** that perform services for us pursuant to a written contract, such real estate appraisers, identity verification services, information verification services, title companies, insurers, closing agents, attorneys, operating systems and platforms, data analysts, marketing services, loan servicers, quality control or compliance auditors, financial institutions, mortgage brokers, accountants, independent public auditors, internet service providers and information technology services.
- **Verification sources** whom we ask to verify information in connection with your loan application, including your current or prior employers, landlords, lenders, banks and financial institutions.
- **Real estate businesses**, such as builders and real estate brokers and agents.
- **Government entities**, including state and federal agencies (1) that supervise or have enforcement authority over us; (2) that verify information in connection with your loan application, such as the IRS or SSA; (3) that provide loan programs, guaranties or insurance, such as the FHA or VA; and (4) law enforcement agencies, such as the FBI or local police.
- **Consumer reporting agencies**, pursuant to the FCRA.
- **Investors**, such as banks, lenders and government-sponsored enterprises, and their agents, in connection with secondary market transactions involving mortgage loans we originate or broker.
- **Insurance companies**, for example, private mortgage insurers, fidelity insurers, flood and real property insurers.
- **Authorized third parties**. Other third parties with whom you ask us to share your personal information.

- **Our affiliates.** Our affiliates include companies that own us, that we own, or that are under common ownership with us.

Note that we do not disclose any nonpublic personal information collected in connection with a financial product or service you request or obtain from us primarily for personal, family, or household purposes, except as set forth in our [Consumer Privacy Notice](#).

## California Consumer Privacy Act Rights Disclosure

This disclosure explains your rights under the California Consumer Privacy Act of 2018 (“CCPA”) and supplements the information in this Privacy Policy. This disclosure applies only to California residents (“you” and “your”) and information that is subject to the CCPA.

The CCPA gives you the **right to know** and the **right to delete** personal information about you and your household that we have collected, used, sold or disclosed, subject to certain exceptions. The CCPA also gives you the right to “opt-out” of the sale of your personal information; however, we do not sell your personal information.

- **Your Rights to Know or Delete.** Request to Know. You have the right to request that we disclose to you: (1) the categories of personal information we have collected about you, (2) the categories of sources from which we collected the personal information, (3) the business or commercial purpose for collecting or selling, if applicable, your personal

information, (4) the categories of your personal information that we have sold or disclosed for a business purpose; (5) the categories of third parties to whom we have sold or disclosed your personal information, and (6) the specific pieces of personal information we have collected about you. The disclosure will cover the preceding twelve-month period. You may submit up to two requests to know in a given twelve-month period. Request to Delete. You also have the right to request that we delete personal information we have collected about you, subject to certain limitations. For example, we can keep your personal information to process, complete or administer your loan transaction, to comply with legal requirements, or for certain internal business purposes as authorized by the CCPA.

- **How to Make a Request.** You may send us a request to know, a request to delete, or both, by using one of the following methods: Email us at [privacy@changellc.com](mailto:privacy@changellc.com) or submit the online form on our [Contact Us](#) page. Please include the following information with your request:
  1. Your first and last name, mailing address, phone number and email address where we can reach you.
  2. Include in the subject line “CCPA Request.” Or, if you’re submitting the form on the Contact Us page, select from the Regarding dropdown, “California Consumer Privacy Act Request (see Privacy Policy).”
  3. State whether you are submitting a “request to know” or a “request to delete,” or both.
  4. State whether you would like us to deliver the information to you by mail or email (we will send the information via a secure link).



Since email communications are not always secure, please do not include sensitive information in any emails to us.

- Call us toll-free at [1-800-581-1303](tel:1-800-581-1303) and follow the instructions carefully. We will confirm our receipt of your request within 10 days and will provide additional information about how we will process your request. We may have to contact you to collect additional personal information to identify you. However, we will use that information solely for the purposes of verifying your request. After we have verified your request, we will respond to your request within 45 days or within any additional time permitted by the CCPA.

You may authorize another person, as your agent, to submit a request on your behalf. If an authorized agent will be submitting a request for you, please indicate that in the email or telephone request. We will verify that your agent has been properly authorized to request information on your behalf. This may take additional time to fulfill your request.

- **Right to Non-discrimination.** You have the right not to receive discriminatory treatment by us for exercising your privacy rights provided by the CCPA.

## **Children's Online Privacy Protection Act**

We do not intend to knowingly collect or solicit any information from anyone under the age of 13. We do not knowingly allow minors under the age of 13 to disclose their personal information to us through our Sites or otherwise. Our websites are directed to individuals who are permitted to share their personal information without parental consent. If you believe that we might have any

information from a child under the age of 13, please contact us by using the [Contact Us](#) section of our website.

## **Hyperlinks**

We may provide links to websites that are owned or operated by other companies (“third-party websites”). When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

## **Updates to this Privacy Policy**

We may update this Online Privacy Policy from time to time. Please reference the “Last Updated” date at the top of this page to see when this Privacy Policy was last revised. Any changes to this Policy will become effective when we post the revised Policy on our Sites. Your use of our Sites following these changes means that you accept the revised Policy.

## **Questions or Concerns**

Please email us at [privacy@changellc.com](mailto:privacy@changellc.com) with any questions or concerns about our privacy policies and practices.