

CCPA PRIVACY NOTICE

This CCPA PRIVACY NOTICE is for California residents only and supplements the information contained in the Privacy Statement of Towne Mortgage Company and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to visitors, client’s, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. The Company does not use or disclose sensitive personal information for purposes other than those specified in California Consumer Privacy Act Regulations 7027 (m).

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected, or disclosed for a business purpose to third parties, the following categories of personal information from consumers within the last twelve (12) months in order to facilitate the processing of mortgage loan applications and mortgage servicing.

Category	Examples and Source from Which the Personal Information is Collected	Third Parties to whom the Personal Information was Disclosed	Collected
A. Identifiers.	<p>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 number, or other similar identifiers.</p> <p>Sources from which collected</p> <ul style="list-style-type: none"> ○ From you ○ From your devices when you interact with our websites and systems ○ From when you apply for and receive products and services ○ From Towne employees when you interact with them and provide PI ○ From brokers, correspondents, appraisers, legal counsel, government- 	None	Yes

	<p>sponsored entities, investors, prior servicers, credit bureaus and other public records</p> <ul style="list-style-type: none"> ○ From beneficiaries, counterparties and other third parties related to a transaction 		
B. Personal information categories listed in the California Customer Records statute	<p>A 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. Some personal information included in this category may overlap with other categories.</p> <p>Sources from which collected</p> <ul style="list-style-type: none"> ○ From you ○ From your devices when you interact with our websites and systems ○ From when you apply for and receive products and services ○ From Towne employees when you interact with them and provide PI ○ From brokers, correspondents, appraisers, legal counsel, government-sponsored entities, investors, prior servicers, credit bureaus and other public records ○ From beneficiaries, counterparties and other third parties related to a transaction 	None	Yes
C. Protected classification characteristics under California or federal law.	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status,</p>	None	Yes

	<p>genetic information (including familial genetic information).</p> <p>Sources from which collected</p> <ul style="list-style-type: none"> ○ From you ○ From your devices when you interact with our websites and systems ○ From when you apply for and receive products and services ○ From Towne employees when you interact with them and provide PI ○ From brokers, correspondents, appraisers, legal counsel, government-sponsored entities, investors, prior servicers, credit bureaus and other public records ○ From beneficiaries, counterparties and other third parties related to a transaction 		
D. Commercial information.	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>Sources from which collected</p> <ul style="list-style-type: none"> ○ From Towne’s Loan Origination System 	None	Yes
E. Biometric information.	<p>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, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	None	No
F. Internet or other similar network activity.	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p> <p>Sources from which collected</p> <ul style="list-style-type: none"> ○ From your devices when you interact with our websites and systems 	None	Yes

G. Geolocation data.	Physical location or movements.	None	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information. Source from which collected <ul style="list-style-type: none"> ○ From you 	None	Yes
I. Professional or employment-related information.	Current or past job history or performance evaluations. Source from which collected <ul style="list-style-type: none"> ○ From you ○ From when you apply for and receive products and services ○ From brokers, correspondents 	None	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.	None	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	None	No

Personal information does not include:

- Publicly available information from federal, state or local government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above in order to facilitate the processing of your mortgage loan application and servicing your mortgage loan from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services that we are asked to perform.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website (www.townemortgage.com, townemortgage.mymortgage-online.com, managemyaccount.townemortgage.com). For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform. For example, credit reporting agencies, appraisers and other service providers.

Retention of Information

We retain your Personal Information consistent with our record retention policies and as required by law. This enables us to comply with legal and regulatory requirements or use it where we need to for legitimate purposes such as managing your loan application or account and dealing with any disputes or concerns that may arise. We may need to retain your information for a longer period when we need the information to comply with regulatory or legal requirements.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to prepare a rate quote or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize and develop our Website, products and services.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- To respond to audits or state or federal examinations by our regulators.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In order to facilitate the processing of mortgage loan applications and servicing mortgage loans, in the preceding twelve (12) months, we have shared the categories of personal information indicated in the “Information We Collect” section set forth above in this Privacy Policy to:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information and we have no intention of doing so in the future. The Company does not collect or sell the personal information of consumers under 16 years of age.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability

Unless your personal information is excluded from the scope of the CCPA, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.

- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

Unless your personal information is excluded from the scope of the CCPA, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 800-979-1993.
- Visiting us at www.townemortgage.com and completing the [CCPA Request Webform](#)
- Emailing us at ccparequest@townemortgage.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Required Information

- First Name & Last Name
- Purpose of your request (access, know, correct or delete)
- Current California Residential Address
- Indicate whether you have or had a Towne account, whether you've been employed by Towne; a beneficiary dependent, emergency contact for Towne employee; or whether you are or were an approved broker partner of Towne
- Name of the Towne employee for which you were a beneficiary, dependent, or emergency contact, if applicable.
- If submitting request on behalf of another person, please provide
- Your name
- Your contact information
- What is your authorization to make this request?
 - i. Registered with the California Secretary of State
 - ii. Power of Attorney; or
 - iii. Parent/Legal Guardian of a Minor

Optional Information

- Loan number, as applicable
- Response method preference, if any
- Other information that may help us identify you like
- Month and year loan opened and/or closed for consumers
- Employment start and/or end date for Towne employees
- Name of broker company for approved broker partner

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. Our practices with regard to verifying a request will vary depending on the request and the information we have on the person making the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions, concerns, or comments about this notice, our Privacy Statement or Information Practices, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 1-800-979-1993

Website: www.townemortgage.com

Email: ccparequest@townemortgage.com

Postal Address: 888 W. Big Beaver Rd., Suite 310, Troy MI 48084

Attn: Compliance

Your Rights under the CCPA

The rights that the CCPA confers on consumers regarding their personal information includes all of the following:

- The right to know what personal information the Company has collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.
- The right to delete personal information that the business has collected from the consumer, subject to certain exceptions.
- The right to correct inaccurate personal information that a business maintains about a consumer.
- If the Company sells or shares personal information, the right to opt-out of the sale or sharing of their personal information by the business.
- If the Company uses or discloses sensitive personal information for reasons other than those set forth in section 7027, subsection (m), the right to limit the use or disclosure of sensitive personal information by the business.
- The right not to receive discriminatory treatment by the Company for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

How You May Exercise Your Rights Under the CCPA

As a consumer you may exercise your rights under the CCPA and may expect all of the following from that process:

- An explanation of the methods by which the consumer can exercise their CCPA rights.
- Instructions for submitting a request under the CCPA, including any links to an online request form or portal for making such a request, if offered by the Company.
- If the Company sells or shares personal information, and is required to provide a Notice of Right to Opt-out of Sale/Sharing, the contents of the Notice of Right to Opt-out of Sale/Sharing or a link to that notice.
- If the Company uses or discloses sensitive personal information for purposes other than those specified in section 7027, subsection (m), and is required to provide a Notice of Right to Limit, the contents of the Notice of Right to Limit or a link to that notice in accordance with section 7014, subsection (f).
- A general description of the process the business uses to verify a consumer request to know, request to delete, and request to correct, when applicable, including any information the consumer must provide.
- Explanation of how an opt-out preference signal will be processed for the consumer (i.e., whether the signal applies to the device, browser, consumer account, and/or offline sales, and in what circumstances) and how the consumer can use an opt-out preference signal.
- If the business processes opt-out preference signals in a frictionless manner, information on how consumers can implement opt-out preference signals for the business to process in a frictionless manner.
- Instructions on how an authorized agent can make a request under the CCPA on the consumer's behalf.

This Privacy Policy was last updated on: April 1, 2024.