

California Consumer Protection Act Privacy Policy

Effective Date: January 1, 2020
Last Reviewed: January 1, 2020

Privacy Notice for California Residents

Nations Direct Mortgage, LLC. (“NDM”, “we”, “us”, or “our”) provides you with this California Consumer Privacy Act Policy (“Policy”), which applies to California residents (“Consumer” or “you”). This Policy was adopted in compliance with the California Consumer Privacy Act of 2018 (“CCPA”), as amended.

California Consumers’ Rights and Choices

If you are a California resident, you are afforded Consumer’s rights and choices regarding your personal information.

Right to Request Information

You may have the right to request information regarding:

- Categories of Personal Information (as defined by applicable California law) collected, sold or disclosed by us;
- Purposes for which categories of Personal Information collected by us are used;
- Sources of information from which we collect Personal Information; and
- Specific pieces of Personal Information we have collected about you.

Right to Request Deletion

You may have the right to request that we delete your personal information that we collected from you, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete, and direct our service providers to delete, your personal information from our records, unless an exception applies.

An exception to your request may apply if retaining the information is necessary for us or our service provider(s) to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 etc.).
- 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
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided

Right to Opt-out of the Sales of Personal Information

You may have the right to request that we refrain from Selling your Personal Information, unless and until you provide express authorization for the Sale of your Personal Information. However, NDM does not sell your personal information to third parties.

Right to non-discrimination

You will not be discriminated against for exercising your rights under the California Consumer Privacy Act.

Our Privacy Policy can be found at: <http://myndm.com/company/privacy-policy/>

Collection of Personal Information from California Residents

We have listed below the personal information we may have collected from California residents in the past 12 months:

| Category | Examples | Collected | Sources |
|--|---|-----------|---|
| Identifiers | A real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifier | Yes | We collect this information from our users, consumers, business partners, and public records from government entities |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)) | 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 | Yes | We collect this information from our users, consumers, business partners, and public records from government entities |
| Protected classification characteristics under California or federal law | 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, genetic information (including familial genetic information). | Yes | We collect this information from our users, consumers, business partners, and public records from government entities |
| Commercial information | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Yes | We collect this information from our users, consumers, business partners, and public records from government entities |
| Professional or employment-related information | Current or past job history or performance evaluations. | Yes | We collect this information from our consumers, mortgage brokers and contracted vendors |
| 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, keystroke, gait, or other physical patterns, and sleep, health, or exercise data | No | We do not collect this information |
| Internet or other similar network activity | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | No | We do not collect this information |
| Geolocation data | Physical location or movements | No | We do not collect this information |

| | | | |
|--|--|----|------------------------------------|
| Sensory data | Audio, electronic, visual, thermal, olfactory, or similar information | No | We do not collect this information |
| Non-Public education information (per the Family Education 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, transcript, class lists, student schedules, student identification codes, student financial information, or student disciplinary records | No | We do not collect this information |
| Inferences drawn from other personal information | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No | We do not collect this information |

Personal Information does not Include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the California Confidentiality of Medical Information Act ("CMIA") or clinical trial data.

Use of Personal Information

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

- To facilitate the process of determining credit eligibility for purposes of obtaining a mortgage.
- To enable use of our site, services, and products.
- To communicate with you, to provide you with support and to respond to your inquiries, including to investigate and address your concerns
- To fulfill the reason, for which you provided the information
- 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

How to Exercise These Rights

You can make requests related to your California privacy rights by accessing the below link:
<https://www.requesteasy.com/5d9fb453cc865600497ce23>

You may also make those requests by calling 1-866-762-3950.

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, email addresses, etc.).

Verification Process

When you make a request, we must verify your identity using your personal information collected and maintained. We will review the information provided and may request additional information via email or other means to ensure we are interacting with the correct individual. If we are unable to verify your identity after a good faith attempt, we may deny your request, and if so, will explain the basis for the denial. Please also be aware that making any such request does not ensure complete or comprehensive removal or deletion of Personal Information or content you may have posted, and there may be circumstances in which the law does not require or allow us to fulfill your request.

Designating an Authorized Agent

For the right to opt-out of the sale of your personal information, you may designate someone to submit requests and act on your behalf. You must provide us with written permission to allow your authorized agent to act on your behalf. However, we do not sell your personal information to third parties.

Sharing Personal Information

We do not provide your personal information to third parties for their direct marketing purposes. Nor do we sell your personal information to third parties. We may share your information to service providers for a business purpose. When we share your information for a business purpose, we enter into a contract that describes the purpose and prohibits the service providers receiving the information from retaining, using, or disclosing the personal information for any purposes other than for the specific purpose of performing the services specified in the contract.

Processing Your Request

We will acknowledge receipt of your request within 10 days and inform you of the timeframe within which it takes to respond. Further verification is required for request for specific pieces of information.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity. We will not honor your request if the information we maintain about you is not subject to CCPA's right to access or deletion.

We will notify you in our response if your request cannot be fulfilled. We will not provide social security numbers, driver's license number or government issued identification numbers, financial account numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will process all verified requests within forty-five (45) days, pursuant to the CCPA. If an extension up to an additional forty-five (45) days to process your request is needed, we will provide you with an explanation for the delay

Children

Our Services are not directed to children, and we do not knowingly collect Personal Information from children under the age of 16. If you learn that a child has provided us with Personal Information, then you may contact us as indicated above.

Do Not Track Requests

You may be using an Internet browser that has the ability to communicate your privacy preferences to the website, including requests not to track your usage and browsing history. Currently, our websites do not respond to any of these signals.

Changes to our CCPA Privacy Policy

We reserve the right to amend this Policy at our discretion any time. When we make changes to this privacy notice, we will post the updated notice on our website with the revision date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes

Question or Concerns

If you have any questions or comments regarding this Disclosure, please contact us at:

Phone: 1-866-762-3950

Email: Privacy@myndm.com

Website: www.NationsDirectMortgage.com

Postal Address: 5 Hutton Centre Drive, Suite 200, Santa Ana, CA 92707