

# Additional Notice for California Consumers

This portion of our Privacy Policy applies to California consumers only. Most visitors to our website are representatives of businesses seeking to interact with us as part of their jobs. This Notice does not apply to information that we collect through these business-to-business interactions or in connection with the Gramm-Leach-Bliley Act (GLBA).

## **How We Collect, Use, and Share Personal Information**

### **1. Personal Information Collected on California Consumers Within the Last Twelve Months**

We collect information from users, as described in our Privacy Policy. The “Personal Information,” as defined in California Civil Code § 1798.140(o), we have obtained on California residents within the last 12 months includes the following:

- A. Identifiers such as name, telephone number, postal and email addresses, internet protocol (IP) address, and other contact information, unique personal identifier, online identifier, account name, social security number, driver’s license number, and/or passport number when you apply for financial services or otherwise conduct a financial transaction.
- B. The following categories of Personal Information described in California Civil Code § 1798.80(e): (1) the Personal Information listed in the preceding bullet point as “identifiers”; (2) insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, signature, and/or other financial information when you apply for financial services or otherwise conduct a financial transaction; and (3) other information that identifies, relates to, describes, is capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household, as described herein.
- C. The following categories of protected classification characteristics under California or federal law: Age (40 years or older), race, ethnicity, marital status, physical or mental disability, sex, veteran or military status.
- D. Commercial information such as records of products or services purchased, or obtained, or considered from us.
- E. Current or past professional or employment-related information, including job history.

For each of these categories, we obtain Personal Information as a service provider on behalf of a financial institution.

Please note that Personal Information does not include publicly available information from government records, deidentified or aggregate consumer information, and Personal Information protected by certain other sector-specific federal or California statutes.

### **2. Our Use of Personal Information for Business Purposes Within the Last Twelve Months**

We use the Personal Information we collect, identified in each of the above categories, for the business purposes disclosed within the Privacy Policy. These business purposes include the following:

- A. Audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
- B. Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
- C. Debugging to identify and repair errors in our systems;
- D. Providing services on our behalf or on behalf of another, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- E. Conducting internal research to develop and demonstrate technology;
- F. Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide;
- G. Preparing statistics and performing analysis to support our operations; and
- H. Receiving and responding to inquiries.

### **3. Sharing of Personal Information Within the Last Twelve Months**

#### **A. Disclosures of Personal Information on California Consumers for Business Purposes**

Within the last twelve months, we have disclosed Personal Information identified in the above categories only for exempt activities, either as part of a business-to-business transaction or in connection with the GLBA.

#### **B. No Sales of Personal Information on California Consumers**

We have not sold any Personal Information described in this Privacy Policy to third parties within the previous twelve months and will not sell Personal Information.

### **California Rights and Choices**

If you are a California resident, you have certain rights related to your Personal Information. Except as otherwise provided by applicable law, you may exercise the following rights for purposes of the Personal Information covered by this Privacy Policy.

#### **A. Right to Know/Portability**

You have the right to request that we disclose to you certain information about Personal Information we collected about you within the past twelve months. Once we confirm your verifiable request, we will disclose to you:

- the categories of Personal Information we have collected about you;
- the categories of sources from which the Personal Information is collected;
- our business or commercial purpose for collecting Personal Information;
- the categories of third parties with whom we share Personal Information; and

- the specific pieces of information we have collected about you.

## **B. Right to Deletion**

You have the right to request deletion of your Personal Information we collected from you and retained, subject to certain exceptions. We may deny your deletion request 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 functionality;
- comply with the California Electronic Communications Privacy Act;
- enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- comply with a legal obligation; or
- make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **C. Right to Non-Discrimination for Exercise of a California Privacy Rights**

We will not discriminate against you because of your exercise of any of the above rights, or any other rights under the CCPA, including by:

- denying you goods or services;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing you a different level or quality of goods or services; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

## **D. How to Submit A Request**

You may submit a request to exercise the rights listed above by:

- using the webform available at <https://www.titleconnectinc.com/california-consumers-privacy-policy-request-form/>
- writing us at Compliance@mortgageconnectlp.com
- calling us at 860-946-4943

### **E. Verifiable Request**

As required under applicable law, we take steps to verify your identity before responding to your request. We may require you to provide information sufficient to allow us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative. We may limit our response to your exercise of the above rights as permitted under applicable law.

### **F. Agent Authorization and Disability Access**

You may designate an authorized agent to make a request on your behalf. As permitted by law, we may require additional verification in response to a request even if you choose to use an agent. You may also make a verifiable consumer request on behalf of your minor child.

To access this Privacy Policy by an alternative method, please contact us at 860-946-4943.

## **Other California Privacy Rights**

### **A. California “Shine the Light” Law (Civil Code Section § 1798.83)**

Under the Shine the Light Law, a California resident may ask us to refrain from sharing your Personal Information with third parties for their direct marketing purposes. We do not share Personal Information of California Consumers with third parties for their marketing purposes.

### **B. Do Not Track**

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how we respond to “Do Not Track” browser settings. We are not currently aware of a worldwide, uniform or consistent industry technology standard or definition for responding to, processing, or communicating “Do Not Track” signals. Accordingly, our website is unable to respond to “Do Not Track” requests from browsers.

## **Contact Information Regarding this California Notice and CCPA**

You may contact us with questions or concerns about our privacy policies or practices and your choices and rights under California law by:

- writing us at [Compliance@mortgageconnectlp.com](mailto:Compliance@mortgageconnectlp.com)
- calling us at 860-946-4943