



## California Consumer Privacy Act Policy

This CALIFORNIA CONSUMER PRIVACY ACT POLICY (“Policy”) is provided by Strong Home Mortgage, LLC (“we,” “us”, or “our”) and supplements the information contained in our Consumer Privacy Policy. This policy applies solely to visitors, users, and others who **reside in the State of California** (“consumers” or “you”). We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as amended and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### PURPOSE

The purpose of this Policy is to comply with California law and to provide you, the consumer, with a comprehensive description of our online and offline practices regarding collection, use and disclosure of personal information (as defined in the CCPA) and of your rights regarding your personal information.

### COVERAGE

The rights and protections contained in the CCPA apply to consumers which are defined as natural persons who are California residents. They do not apply to business entities or natural persons who reside outside of California, for other than transitory purposes.

### YOUR RIGHTS AND CHOICES

The CCPA provides you with specific rights regarding your personal information. Subject to certain exceptions under the law, the CCPA grants you the following rights:

- The right to request the categories of personal information that we have collected about you;
- The right to request the categories of sources from which your personal information is collected;
- The right to request the business or commercial purpose for collecting or selling your personal information;
- The right to request the categories of third parties with whom we share your personal information;
- The right to request the specific pieces of personal information we have collected about you;
- The right to request that we delete certain personal information that we have collected from you;
- The right to request the categories of personal information that we disclosed about you for a business purpose;
- The right to request the categories of personal information sold and the categories of third parties to whom your information was sold;
- The right to opt out of the sale of your personal information, and
- The right not to be discriminated against as a result of your exercise of any of these consumer rights.

### SALE OF PERSONAL INFORMATION

**Strong Home Mortgage, LLC does not sell consumer information** nor have we sold your personal information in the preceding 12 months outside of the permitted sharing, disclosures, or transfers made pursuant to the exemptions of the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act.

### PERSONAL INFORMATION WE COLLECT:

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (personal information). In the preceding 12 months, We have collected the following categories of personal information about Consumers:

Category	Example	Categories of Third-Parties with whom information is disclosed
A. 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 number, or other similar identifiers.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below).  Party: Data Analytics Providers, Client Relationship Management Software
B. 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. <i>Some personal information included in this category may overlap with other categories.</i>	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below).  Party: Data Analytics Providers, Client Relationship Management Software
C. Protected classification characteristics under California or federal law.	Race, color, religion, sex/gender, marital status, military or veteran status, national origin (including from language use or possession of special driver's license), ancestry, age, familial status, medical conditions, receipt of public assistance, and exercising consumer rights.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)  Party: Data Analytics Providers
D. Commercial information.	Records of products or services obtained, or considered, prior loans obtained, asset and liability information as part of the application process.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below).  Non-Customers: Data Analytics Providers, Client Relationship Management Software
E. Internet or other similar network activity.	Information on a consumer's interaction with an internet website, application or advertisement activity.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below).  Party: Data Analytics Providers
F. Geolocation Data	Physical location only as recorded as part of any electronic signature records	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)  Party: N/A
G. Sensory Data	Audio, electronic or similar information, as part of any voice call recordings	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)  Party: N/A
H. Professional or employment related information	Current or past job history as part of the loan application process.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)  Party: N/A
J. Non-public education information (Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Educational records directly related to a student that are maintained by an educational institution such as years in school or student loans obtained as part of the loan application process.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)  Party: N/A



## EXCEPTIONS TO THE CCPA:

Personal information does **NOT** include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information we have collected and disclosed in the categories above if it is information:
  - Regarding certain medical information governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Involving the collection, maintenance, disclosure, sale, communication, or use of certain personal information bearing on your credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency, by a furnisher of information, and by a user of a consumer report, to the extent such activity is subject to regulation under and authorized by the Fair Credit Reporting Act (FRCA);
  - Regarding certain personal information collected, processed, sold, or disclosed pursuant to the California Financial Information Privacy Act (FIPA), the Gramm-Leach-Bliley Act (GLBA) (see our separate US Consumer Privacy Notice) or the Driver's Privacy Protection Act of 1994.

## SOURCES FROM WHICH WE RECEIVE PERSONAL INFORMATION:

We obtain the categories of personal information listed above from the following sources:

- Directly from our clients or their agents. For example, from documents that you or your agent submits to us when you or your agent submits a loan application to us.
- Indirectly from our clients or their agents. For example, through information we collect on our clients in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, from submissions through our website application portal or contact forms.
- Advertising Networks
- Internet Service Providers
- Client Relationship Management software
- Government entities
- Operating Systems and Platforms
- Consumer Reporting Agencies or Consumer Data Resellers
- From third parties that interact with us in connection with the services we perform.
- From Lead Providers that consumers have provided information to regarding inquiries for mortgage loans.

## OUR PURPOSES FOR COLLECTING, USING OR SELLING PERSONAL INFORMATION:

- To fulfill or meet the reason for which the information is provided, including maintaining or servicing accounts, verifying customer information, processing payments and providing financing.
- 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.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and prosecuting those responsible.

- For internal 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 or regulatory examinations 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.

#### CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE 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:

- Advertising Networks
- Internet Service Providers
- Data Analytics Providers
- Government Entities
- Operating Systems and Platforms
- Law, Consulting or other professional practice firms
- Consumer Reporting Agencies or Consumer Data Resellers
- Other third party service providers with which we contract.
- 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.

#### RIGHT TO ACCESS AND REQUEST DELETION OF YOUR PERSONAL INFORMATION:

You have the right to request, pursuant to a “Verified Request” that provide access to and/or delete any of your personal information that we collected from you and retained, subject to certain exceptions.

In the event that we receive a “Verified Request” to delete information that is not covered by a restriction or exemption, we will notify you within 45 days and delete your personal information from our records and direct any Service Providers to delete your personal information from its records. In the event that we receive a “Verified Request” to delete information that is covered by a restriction or exemption, we will deny your request and within 45 days provide you a response indicating why it is denied.

We may deny your deletion request if we cannot verify your identity, we cannot verify the authorization of your agent, if the information was not collected from you or is otherwise not subject to the rights granted by the CCPA (see **EXEMPTIONS TO THE CCPA** above), or, if retaining the information is necessary for us or our Service Providers 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.
- 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 seq.*).



- 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.
- 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 it.

### AUTHORIZED AGENTS

You may use an agent registered with the California Secretary of State that you have authorized to act on your behalf to make a CCPA request on your behalf. But we will require you, as the consumer on behalf of whom such request is made, to verify your own identity directly with us and to provide proof that the agent has been authorized to submit the request on your behalf. Alternatively, you or the authorized agent can provide proof that the agent has a power of attorney.

### RIGHT NOT TO BE DISCRIMINATED AGAINST

We are prohibited from discriminating against a consumer because the consumer has exercised any of their rights under the CCPA, including, but not limited to:

- Denying goods or services to the Consumer;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing different level or quality of goods or services to the Consumer;
- Suggesting that the Consumer will receive a different price or rate for goods or services or different level of goods or services.

### CHANGES TO OUR CALIFORNIA PRIVACY POLICY

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 US

If you have any questions or comments about this notice, our Privacy Statement, 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: (800) 862-7803
- Email: [info@stronghome.com](mailto:info@stronghome.com)
- Postal Address:  
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