

Privacy Notice for California Residents

Homeowners Financial Group USA, LLC (“HFG” or “us” or “we”) is committed to protecting the privacy and security of the personal information it collects. This Privacy Notice for California Residents (“Privacy Notice”) supplements HFG’s Privacy Policy and only applies to residents of the State of California (“consumers,” or “you”). We are providing this Privacy Notice pursuant to the California Consumer Privacy Act of 2018 (“CCPA”) and California Privacy Rights Act of 2020 (“CPRA”) and terms defined in the CCPA/CPRA have the same meaning when used in this Privacy Notice.

Introduction

Under the CCPA, “personal information” means 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, or household. This Privacy Notice explains how we collect, use, and share your personal information and sensitive personal information. It also describes your privacy rights and our obligations under the CCPA/CPRA regarding your personal information/sensitive personal information. However, please note that your privacy rights and our obligations described herein do not apply to certain personal information. For example, your privacy rights and our obligations noted in this Privacy Policy do not apply to personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (“GLBA”) and its implementing regulations. Please see HFG’s Privacy Policy to find out how we collect, share, and protect information covered under GLBA.

Collection and Sources of Personal Information/Sensitive Personal Information

We identify below the categories of personal information that we have collected from consumers in the past 12 months.

Category	Examples
Identifiers	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.
Personal information and sensitive personal information categories listed in the California Customer Records	Name, signature, Social Security number, address, telephone number, passport number, data on race and ethnicity, driver's license or state identification card number, date of birth, education, employment, employment history, tax returns, income, credit history, credit scores, payment history, retirement account balance, retirement account number, checking and savings account balance, bank account number, credit card number, debit card number, or

statute (Cal. Civ. Code § 1798.80(e))	any other financial information. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law	Age, race, national origin, citizenship, marital status, sex, sexual orientation, or veteran or military status.
Commercial information	Records of personal property, assets, rental history, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Professional or employment-related information	Work history or employer's information.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 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, or student financial information.
Sensory data	Audio, electronic, visual, or similar information.
Biometric information	Keystroke.
Geolocation data	Physical location or movements.
Inferences drawn from the above listed personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The categories of sources from whom we collected each category of personal information/sensitive personal information above in the past 12 months are:

- Directly from consumers or consumers' representatives
- Third parties that are authorized to provide or release personal information about consumers (e.g., current or past employers, financial institutions, landlords, consumer reporting agencies, or service providers)
- Government entities

Use of Personal Information and Sensitive Personal Information

In the past 12 months, we have used each category of personal information and sensitive personal information above for the following business purposes:

- Performing services, including offering, processing, underwriting, making, or servicing residential mortgage loans
- Developing and carrying out marketing activities
- Providing customer support and managing our relationship with you
- Creating, maintaining, and securing your loan account
- Auditing or quality control
- Complying with applicable law, agency requirements or investor requirements
- Responding to requests from law enforcement and regulators

Disclosure of Personal Information and Sensitive Personal Information

In the past 12 months, we have disclosed the following categories of personal information and sensitive personal information for a business purpose:

- Identifiers
- Personal information categories described in the California Customer Records statute
- Protected classification characteristics under California or federal law
- Commercial information
- Professional or employment-related information
- Non-public education information
- Geolocation data
- Inferences drawn from personal information

We disclosed the above noted categories of personal information and sensitive personal information for a business purpose to the following categories of third parties:

- Service providers, vendors, or third parties that provide mortgage, real property, or credit or financial-related services (e.g., appraisers, closing agents, title agents, PMI companies, or consumer reporting agencies)
- Service providers, vendors, or third parties that provide services related to compliance, website hosting, information technology, data security, or support services
- Investors or wholesale lenders
- Government agencies

Sale of Personal Information and Sensitive Personal Information

We do not sell, will not sell, and have not sold in the past 12 months, personal information to third parties, including personal information of minors under the age 16.

Data Retention Notification

We will retain data for five (5) years unless otherwise defined by state statutory requirement.

Information Collected by Third Parties

Third Parties are based on contractual business relationships we have with our service providers who assist us in the administration process of your loan. The collection of personal information on behalf of Homeowners Financial Group USA, LLC is to perform the service requested by the consumer.

Your Rights Under the CCPA/CPRA

Right to Know

You have the right to request that we disclose the following information covering the 12 months preceding your request:

- The specific pieces of personal information and sensitive personal information about you that we collected;
- The categories of personal information about you that we collected;
- The categories of sources from which your personal information was collected;
- The categories of personal information about you that we sold or disclosed for a business purpose;
- The categories of third parties with whom your personal information was sold or disclosed for a business or commercial purpose; and
- The business or commercial purpose for collecting or selling your personal information.

Right to Delete

You have the right to request that HFG and our service providers delete personal information about you that we have collected which is subject to certain exceptions specified in the CCPA/CPRA.

Right to Opt-Out

If we sold personal information, you would have the right to request that HFG not sell your personal information to third parties. Although we do not sell your personal data, we may share that data with our business partners in order to perform the services requested by you.

HFG processes opt-out preference signals in a frictionless manner. Consumers may implement an opt-out preference by visiting www.homeownersfg.com and indicating their option once the pop-up privacy window appears.

Right to Nondiscrimination

You have the right to not be discriminated against for exercising any of your rights under the CCPA/CPRA.

Right to Correct Inaccurate Information

You have the right to request that HFG and our service providers to correct inaccurate personal information.

Exercising Your Right

Please submit a verifiable consumer request using the form located here, and either email or print and mail to:

- **Mailing** us at Compliance c/o Homeowners Financial Group USA, LLC at 16427 N Scottsdale Rd, Suite 145, Scottsdale, AZ 85254
- **Emailing** us at Compliance@homeownersfg.com

You may only make a verifiable consumer request twice within a 12-month period.

A verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative. This may include requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we maintain and which we have determined to be reliable for the purpose of verification. For example, we may request that you validate the last 4 digits of your Social Security number and one other identifying component from data in your loan file (e.g., past employer, credit reference on your credit report, or the bank you do business with).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. We also do not charge a fee to process or respond to verifiable consumer requests.

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, may make a verifiable consume request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an authorized agent make a verifiable consumer requests on your behalf, they will need to provide us with sufficient written proof that you have designated them as your authorized agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Upon receiving a consumer request, we will confirm receipt of the request within 10 days and provide information on how we will process the request. We will work to process all verified requests within 45 days. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay. Any disclosures we provide will only cover the 12-month period preceding the receipt of a verifiable request. We will advise you in our response if we are not able to honor your request.

Please note that we will not disclose Social Security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers. We will also not disclose specific pieces of personal information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account with us, or our systems or network.

Changes to Our Privacy Notice

We may update this Privacy Notice from time to time. If we update this document, we will post the updated Privacy Notice on HFG's website and revise the "Last Updated" date. Your continued use of our website and/or services following the posting of changes constitutes your acceptance of such changes.

Contact Us

If you have a disability and would like to access this Privacy Notice in another format, or if you have any questions or concerns about this Privacy Notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please contact us by:

- **Emailing** us at Compliance@homeownersfg.com
- **Calling** us at 1-877-305-5571