#### PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy Statement of Arc Home LLC (collectively, "we," "us," or "our") and applies solely to visitors, 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.

#### 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 the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Does Arc collect this Category of Information?	Where does Arc Collect Information From	What is the Business Purpose for Collecting the Information?	Parties with Whom Arc shares this Information
A. Identifiers	A real name, alias, postal	YES	Consumer Directly,	Mortgage loan	See **Footnote Below
	address, unique personal		Lead Providers,	origination, loan	
	identifier, online identifier,		Mortgage Brokers,	servicing and related	
	Internet Protocol address, email		Correspondent	services.	
	address, account name, Social		Lenders	See *Footnote Below.	
	Security number, driver's license			See Tooulote Delow.	

	number, passport number, or other similar identifiers.				
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, any other financial information, or medical information. Some personal information included in this category may overlap with other categories.	YES	Consumer Directly, Lead Providers, Mortgage Brokers, Correspondent Lenders	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
C. Protected classification characteristics under	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, , veteran or	YES	Consumer Directly, Lead Providers, Mortgage Brokers,	Mortgage loan origination, loan servicing and related services.	See **Footnote Below

California or federal law	military status, genetic information.		Correspondent Lenders	See *Footnote Below.	
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	Consumer Directly, Government Entities, Lead Providers, Mortgage Brokers, Correspondent Lenders	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
E. 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, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's	YES	Consumer Directly, Lead Providers	Mortgage loan origination, loan	See **Footnote Below

	interaction with a website, application, or advertisement.			servicing and related services. See *Footnote Below.	
G. Geolocation data	Physical location or movements.	NO	N/A	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	N/A	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
I. Professional or employment-related information	Current or past job history or performance evaluations.	YES	Consumer Directly, Government Entities, Lead Providers	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
J. Non-public education information (per the Family	Education records directly related to a student maintained by an educational institution or party	NO	Consumer Directly, Government Entities, Lead Providers	Mortgage loan origination, loan	See **Footnote Below

Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.			servicing and related services. See *Footnote Below.	
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A	Mortgage loan origination, loan servicing and related services. See *Footnote Below.	See **Footnote Below
L. Sensitive Personal Information	1. Government identifiers (social security, driver's license, state identification card, or passport number).	YES. See Section B Ab	oove.		
	2. Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password).	YES. See Section B Ab	oove.		

3. Precise geolocation.	NO	n/a			
4. Racial or ethnic origin.	YES. See Section C Above.				
5. Religious or philosophical beliefs.	NO	n/a			
6. Union membership.	NO	n/a			
7. Genetic Data	NO	n/a			
8. Unique identifying biometric information.	NO	n/a			
9.Health, sex life, or sexual orientation information.	NO	n/a			

\* Related services may include, but are not limited to real estate services, mortgage loan servicing, insurance, escrow and other closing services, notary, appraisal, other consumer credit services, and other services related to home purchase, home ownership, or related consumer transactions.

\*\* While we do not sell your data, we may share that data with our joint marketing partners should we chose to engage such activities. This sharing is done pursuant to federal law and is exempt from the California state requirements under CCPA.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - 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 from the following categories of sources:

- Directly from our borrower or their agents, in the case of mortgage brokers. For example, from documents that our borrower provide to us related to the origination of their mortgage loans.
- Indirectly from our borrowers or their agents. For example, through information we collect from our borrowers in the course of providing services to them.
- Directly and indirectly from activity on our website (<u>www.archome.com</u>, <u>www.archomedirect.com</u>). 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 on behalf of our borrowers (e.g., credit history from credit bureaus, title to property information from their title agents, etc.).

#### 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 loan application, we will use that information to prepare the application.
- 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.
- To improve our website and present its contents to you.

- 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.

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.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category F: Internet or Other Similar Activity
- Category I: Professional or employment-related information.

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

- Business partners used throughout the loan origination process and the servicing of your loan, for example: real estate appraisers, credit reporting agencies, title insurance companies, auditors, property preservation companies, foreclosure law firms/trustees, as well as the owner/investor of your loan.
- Federal and state governmental agencies as part of the loan process or their supervision of the company.
- Loan investors, loan insurers and securitizers such as Fannie Mae, Freddie Mac, GNMA, HUD-FHA-VA.
- 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.
- Cloud storage providers.

- Payment processors.
- Cybersecurity service providers.

In the preceding twelve (12) months, we have not sold any personal information.

### 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 Rights

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, as applicable:

- 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 disclosed your personal information for a business purpose, a separate list disclosing:
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

# Deletion Request Rights

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. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 7. Comply with a legal obligation.
- 8. 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 844.851.3600
- Emailing us at privacy@archomeloans.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.

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.

#### 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 f
- or goods or services or a different level or quality of goods or services.

#### Using an Authorized Agent to Submit a Request

Only you, a person registered with the California Secretary of State, or a person 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. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to verify your identity directly by submitting a verified consumer request according to the procedures in the section "Submitting

a Verified Consumer Request." If anyone purporting to be an authorized agent for a consumer contacts us, we will require proof that the authorized agent has been authorized to act on the consumer's behalf.

#### 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.

#### Data Storage & Security

We use a reasonable standard of care to store and protect your information. We use appropriate physical, technical and organizational security measures and procedures to protect personal information from unauthorized use, loss, alteration, destruction or modification. We shall retain your personal information until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your personal information may be retained for that

## **Contact Information**

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: 844.851.3600

Website: www.archome.com

Email: privacy@archomeloans.com

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