

# CENTENNIAL LENDING CALIFORNIA CONSUMER PRIVACY ACT (“CCPA”) PRIVACY STATEMENT

Last Updated: January 21, 2022

This CCPA Privacy Policy is adopted in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) for California residents and explains how we collect, share, use, and protect personal information. As used in this CCPA Privacy Policy, “personal information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information ***does not*** include: (i) publicly available information from government records; (ii) deidentified or aggregated consumer information; or (iii) personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and federal the Gramm-Leach-Bliley Act (GLBA). Accordingly, the specific personal information that we collect, use and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Privacy Policy ***does not*** apply with respect to information that we collect about California residents who we provide financial products and services to for personal, family, or household purposes. Rather, our Federal Privacy Policy governs our collection and use of such personal information.

## I. CATEGORIES OF PERSONAL INFORMATION WE COLLECT

In the preceding 12-months, we have collected the following categories of personal information (please note that some categories overlap):

Category	Examples	Collected
A. Identifiers	Name; postal address; signature; home phone number or mobile phone number; bank account number, credit card number, debit card number, or other financial information; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.	[YES]
B. Protected classification characteristics under state or federal law	Age (40 years or older), race, national origin, citizenship, marital status, sex, military status, or similar information.	[YES]
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	[YES]
D. 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]
E. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	[YES]
F. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.	[YES]
G. Sensory data	Audio, electronic, visual, or similar information.	[YES]
H. Professional or employment-related information.	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records; Emergency contact information, such as the name, phone number, address and email address of another person in the context of having an emergency contact on file; Personal information necessary for us to collect and retain to administer benefits for you and another personal relating to you (e.g., your spouse, domestic partner, and dependents), such as their name, Social Security Number, date of birth, telephone number, email, and address.	[YES]
I. Non-public education information	Educational 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, student financial information, or student disciplinary records.	[NO]
J. Inferences drawn from other personal information.	Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	[NO]

## II. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT

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

### a. *From You or Your Authorized Agent*

We may collect information directly from you or your authorized agent. For example, when you provide us your name and address to apply for a loan.

### b. *From Our Website and Applications That You Access on Your Mobile Device*

We collect certain information from your activity on our website and your use of our applications on your mobile device. Please see our Online Privacy Statement for additional details.

### c. *Third-party service providers in connection with our services or our business purposes*

We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.

**d. Information we collect from third-parties in connection with our services or our business purposes**

We collect information from third-parties for our business purposes. For example, we provide loan servicing services to other lenders who will provide us information about your account and transactional history.

**III. HOW WE USE YOUR PERSONAL INFORMATION**

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

- To provide you with information, products or services that you request from us.
- To service your loan with another financial institution as its service provider.
- To evaluate your candidacy for employment or for an independent contractor engagement, and to administer employment-related benefits for you, your spouse or domestic partner, and your dependents.
- To provide you with email alerts, event registrations or 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.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- 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.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.

We also use your personal information to advance our commercial or economic interests (“commercial purpose”), such as advertising our products and services, or enabling or effecting, directly or indirectly, a commercial transaction.

**IV. SHARING PERSONAL INFORMATION**

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

Category of Personal Information	Category of Third-Parties
A: Identifiers	<ul style="list-style-type: none"> <li>• Our third-party service providers.</li> <li>• Other companies to bring you co-branded services, products or programs.</li> <li>• 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.</li> <li>• Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.</li> </ul>
B: Protected classification characteristics under state or federal law	Same as above.
C: Commercial information	Same as above.
D: Biometric information	None.
E: Internet or other similar network activity	Same as above.
F: Geolocation data	Same as above.
G: Sensory data	None.
H: Professional or employment-related information.	None.
I: Non-public education information	None.
J: Inferences drawn from other personal information.	None.

**V. RIGHTS AND CHOICES FOR CALIFORNIA RESIDENTS**

If you are a California resident, this section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices under the CCPA.

**a. Exceptions**

In the following instances, none of the rights and choices in this Section V apply to you:

- If you are not a California resident.
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994. How we collect, share, use and protect your personal information covered under the GLBA is covered under our Federal Privacy Policy.
- Aggregate consumer information.
- Deidentified personal information.
- Publicly available information.

Furthermore, if we collected your personal information in the context of servicing your loan for another financial institution as a service provider, we are not obligated under the CCPA to respond to your request for access to your personal information or to delete your personal information. You should submit your CCPA request directly to your lender.

**b. Access to Your Personal Information and Data Portability Rights**

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, 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 from the date we receive your request. Once we receive and confirm your request and verify that the request is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- 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 to whom we sold or disclosed the category of personal information for a business or commercial purpose.
- The business or commercial purpose for which we sold or disclosed the category of personal information.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a "data portability request").

**c. Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and verify your 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 that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. 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 businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent.
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.

**d. Exercising Access, Data Portability, Deletion and Correction Rights**

To exercise the access, data portability, deletion and correction rights described above, a consumer or a consumer's authorized agent may submit a verifiable consumer request to us by:

- Calling us at 866-588-1100.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request will not be deemed received until you return a completed CCPA Request Form to us or you provide us with the same information telephonically.

**e. General Statement Regarding Identity Verification**

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. However, we may consider requests made through a password protected account with us

sufficiently verified when the request relates to personal information associated with that specific account. If we receive a request through and authorized agent of the consumer, we will require:

- Submission of a written document signed by the consumer with the consumer's permission for the authorized agent to submit a verifiable request on their behalf and require the authorized agent to verify their own identity to us; or
- The consumer to directly verify with us that they have authorized the agent to submit the request.
- We will not require either of the above if the authorized agent provides a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and we are able to verify authorized agent's identity.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it. We will ask you to complete the CCPA Request Form which will ask you for information that will help us verify your identity. The verification process includes matching the information you provide us with the information we have in our records. The stringency of the verification process depends on the sensitivity of the request, whether or not the consumer is a current customer with a password-protected account, the need to prevent unauthorized access and disclosure of personal information and other factors. Within 10-days of your submission of your CCPA request, we will notify you of any additional information we might need to verify your identity.

#### **VI. *Response Timing and Format***

We will 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.

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.

#### **VII. *Right of Non-Discrimination***

We will not discriminate against you for exercising any of your rights in this CCPA Privacy Policy and under applicable laws. Unless permitted by law, 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 for goods or services or a different level or quality of goods or services.

#### **VIII. CHANGES TO THE CCPA PRIVACY POLICY**

We reserve the right to amend this CCPA Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post an updated version on our website.

#### **IX. CONTACT INFORMATION**

If you have any questions or comments about this CCPA 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, or to request changes to any of your personal information that we have collected, please do not hesitate to contact us at:

Phone: 866-588-1100  
Website: [www.centennial-lending.com](http://www.centennial-lending.com)  
Email: [info@centennial-lending.com](mailto:info@centennial-lending.com)  
Mail: Attn: Loan Servicing  
11281 Business Park Cir  
Firestone, CO. 80504