

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

Last Updated: March 17th, 2023

This CCPA Privacy Statement is adopted in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”) for California residents and explains how we collect, share, use, and protect personal information. As used in this CCPA Privacy Statement, “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 Statement 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 person 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 (per the 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 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
L. Sensitive Personal Information.	A consumer's social security, driver's license, state identification card, or passport number.	YES

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 activity on our website (insert website address) and your use of 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 for a commercial purpose*

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 membership, products and services, or enabling or effecting, directly or indirectly, a commercial transaction.

We do not use or disclose your sensitive personal information for any purpose other than, as reasonably necessary and proportionate, for the following purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods and services.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside of your current interaction with us.
- For our service providers or contractors to perform services on our behalf, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.
- To verify or maintain the quality or safety of a service or device that is owned, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured for, or controlled by us; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about you.

IV. SHARING PERSONAL INFORMATION

We disclose your personal information to third-parties for our business purposes. In the preceding 12-months, we have disclosed the following categories of personal information for a business purpose and, for each category, the following categories of third-parties with whom such personal information was shared:

Category of Personal Information	Category of Third-Parties
Identifiers	<ul style="list-style-type: none"> • Our third-party service providers. • Other companies to bring you co-branded services, products or programs. • 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. • 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.
Protected classification characteristics under state or federal law	Same as above.
Commercial information	Same as above.
Internet or other similar network activity	Same as above.
Geolocation data	Same as above.
Sensitive personal information	<ul style="list-style-type: none"> • Our third-party service providers. • 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. • 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.

We do not share the following categories of personal information with third parties: (1) Biometric Information; (2) Sensory data; (3) Professional or employment-related information; (4) Non-public education information; or (5) Inferences drawn from other personal information.

V. SELLING PERSONAL INFORMATION OR SHARING PERSONAL INFORMATION FOR BEHAVIORAL ADVERTISING PURPOSES

It is not our policy to sell personal information and we have not done so in the preceding 12-months. We also do not share your personal information for cross-context behavioral advertising purposes.

VI. 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, the rights and choices in this Section VI do not 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. Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
6. 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.
7. To enable solely internal uses that are reasonably aligned with your expectation based on your relationship with the us and compatible with the context in which you provided the information.
8. Comply with a legal obligation.

d. Right to Correct Inaccurate Personal Information

You have the right to request to correct any inaccurate personal information that we maintain about you.

e. 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 either:

- Calling us at 866-588-1100.
- [CLICK HERE](#) or visit www.centennial-lending.com/ccpa-request to complete an online CCPA Submission Form

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.

f. 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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. If we receive a request through your authorized agent, we may require:

1. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
2. You to directly verify with us that you have provided the authorized agent to submit the request.
3. We will not require either of the above if your 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.

g. *Response Timing and Format*

We attempt 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. 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.

h. *Right to Opt-Out of the Sale or Sharing of Personal Information*

You have the right opt-out of the sale or sharing of your personal information. However, we do not sell or share your personal information for cross-context behavioral advertisement purposes.

i. *Right of Non-Discrimination*

We will not discriminate against you for exercising any of your rights in this CCPA Privacy Statement 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.

As permissible under the CCPA, we may offer you certain financial incentives that may result in different prices, rates, or quality levels. Such incentives will be reasonably related to your personal information's value and contain written terms that describe the program's material aspects.

VII. CHANGES TO THE CCPA PRIVACY STATEMENT

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

VIII. 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 correction 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
Email: servicing@centennial-lending.com
Mail: Attn: Loan Servicing
11281 Business Park Circle
Firestone, CO 80504