
PRIVACY NOTICE

Privacy Notice for California Residents

Effective December 17, 2019 | Last updated on: June 29, 2020

This **Privacy Notice for California Residents** supplements the information contained in Primary Residential Mortgage, Inc.'s ("PRMI") Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). This notice contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of California residents regarding their personal information.

While we believe that much of the personal information we collect is exempted under the Gramm-Leach-Bliley Act exemption of the California Consumer Privacy Act of 2018 ("CCPA"), we are adopting this notice to recognize certain rights of consumers under the CCPA. Any terms defined in the CCPA have the same meaning when used in this notice.

This notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals (see PRMI's Notice to California Employees and Prospective Employees).

Where noted in this notice, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("**B2B personal information**") from some its requirements

Information We Collect

PRMI collects 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, household or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Medical information governed by the California Confidentiality of Medical Information Act (CMIA), protected health information collected by a covered entity or business associate governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), or clinical trial data; personal information covered by certain 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.

Again, while we believe that much of the personal information we collect is exempted from the CCPA based on the CCPA's GLBA exemption, we will not be relying on that exemption for purposes of providing the rights discussed herein.

In particular, we may collect the following categories of personal information from our consumers:

Category	Examples
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.
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, or medical information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data.	Physical location.
G. Sensory data.	Audio, electronic, visual, or similar information.
H. Professional or employment-related information.	Current or past job history or performance evaluations.
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)).	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 identification codes, or student financial information.

PRMI obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete, applications you submit, or products and services you obtain.
- Indirectly from you. For example, from lead generation companies.
- Service Providers. For example, credit bureaus or credit and verification providers.
- Government entities. For example, from government records.
- Data Analytics Providers. For example, Google Analytics.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request information on obtaining a residential loan or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to apply for a residential loan, we will use that information to process your application, payment and facilitate loan closing. We may also save your information for legal or regulatory purposes, loan fulfillment, and/or loan servicing.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your complaints and monitor and improve our responses.
- To provide auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- To debug to identify and repair errors that impair existing intended functionality.
- For short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- To perform services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, or providing similar services.
- 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.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of PRMI's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by PRMI about our consumers is among the assets transferred.
- To advertise to you
- To offer employment

PRMI 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

PRMI may disclose your personal information to a third party for a business purpose. PRMI does not sell your personal information. When we disclose personal information for a business purpose, we enter into 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.

The following table identifies the categories of personal information that we disclosed for a business purpose in the 12 months preceding the Effective Date of this notice and, for each category, the category of third parties to whom the personal information was disclosed. We did not sell personal information to third parties in the 12 months preceding the Effective Date of this notice.

Category A	Data Analytics Providers
Categories A, B, and H	Service Providers Investors Government entities
Category C	Government entities Investors
Category D	Marketing providers
Category I	Investors Government entities

Sales of Personal Information

PRMI does not sell your personal information. PRMI does not knowingly sell the personal information of any minors (those under the age of 16).

Your Rights and Choices

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know

You have the right to request that PRMI 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 (see Exercising Right to Know and Deletion Rights), we will disclose to you:

- 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.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide the right to know for B2B personal information.

Deletion Request Rights

You have the right to request that PRMI 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 (see Exercising Right to Know and Deletion Rights), 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 a statutory or regulatory exception applies or retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a loan 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.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. 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.

We do not provide these deletion rights for B2B personal information.

Exercising Right to Know and Deletion Rights

To exercise the right to know and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 800-255-2792 ext 1000025
- Visiting <https://www.primeres.com/ccpa-form>.

Only you, or someone legally authorized 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 are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

You may only make a verifiable consumer request for the right to know 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 forty-five calendar (45) days of its receipt. If we require more time (up to 90 calendar 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.

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.

Personal Information Sales Opt-Out and Opt-In Rights

Consumers have the right to direct a business that sells your personal information to stop selling it and to refrain from doing so in the future.

PRMI does not sell your personal information and therefore does not have an opt-out process.

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 for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We currently do not offer any financial incentives.

Accessibility

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.

Contact Information

If you have any questions or comments about this notice, the ways in which PRMI collects and uses your information described below and in the Privacy Policy, 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: 800-255-2792, extension 1000025

Website: <https://www.primeres.com/ccpa-form>

Postal Address:

Primary Residential Mortgage, Inc.
Attn: Compliance Department
1480 North 2200 West
Salt Lake City, UT 84116

Notice to California Employees and Prospective Employees

Effective December 17, 2019 | Last updated on: June 29, 2020

This **Notice to California Employees and Prospective Employees** is provided pursuant to the California Consumer Privacy Act of 2018 ("CCPA") and applies solely to all Primary Residential Mortgage, Inc. ("PRMI" or "we") employees, job applicants, contractors, or similar individuals who reside in the State of California (collectively, "employees" or "you"). Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

PRMI collects 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 employee (“personal information”). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated information.
- Information excluded from the CCPA’s scope, like:
 - medical information governed by the California Confidentiality of Medical Information Act (CMIA), protected health information collected by a covered entity or business associate governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), or clinical trial data;
 - personal information covered by certain 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.

In particular, we may collect the following categories of personal information from employees:

Category	Examples
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.
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, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, or medical information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories.
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, gait, or other physical patterns, and sleep, health, or exercise data.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
G. Geolocation data.	Physical location.
H. Sensory data.	Audio, electronic, visual, or similar information.

Category	Examples
I. Professional or employment-related information.	Current or past job history or performance evaluations.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 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 identification codes, or student financial information.

PRMI obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete.
- Indirectly from you. For example, if you apply through a staffing company or from an advertisement placed on a third party website.
- Indirectly from you. For example, if you apply through a staffing company.
- Service Providers. For example, credit bureaus or background check providers.

Use of Personal Information

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

- To consider your employment application.
- To conduct background checks as part of the application process.
- If you are hired, we will use your personal information for all purposes of providing you with employment such as to pay you and provide you with benefits, to comply with federal and state laws (e.g., tax laws), to prevent the spread of pandemics, like COVID-19, to enroll you in a retirement plan, and to provide you with an email address and login credentials.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of PRMI's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by PRMI about our employees is among the assets transferred.

PRMI 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.

Accessibility

We are committed to ensuring this notice is accessible to individuals with disabilities. If you wish to access this notice in an alternative format, please contact us using the information provided below.

Contact Information

If you have any questions or comments about this notice, the ways in which PRMI collects and uses your information described below and in the Privacy Policy, or your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 800-255-2792, extension 1000025

Website: <https://www.primeres.com/about/careers>

Postal Address:

Primary Residential Mortgage, Inc.
 Attn: Compliance Department
 1480 North 2200 West
 Salt Lake City, UT 84116