

California Consumer Privacy Act Notice at Collection and Privacy Policy

Applicability

The California Consumer Privacy Act (“CCPA”) provides all consumers who are California residents with specific rights regarding their personal information. This Notice and Policy describe your CCPA rights and explains how to exercise those rights.

Introduction

This CCPA Notice at Collection ("Notice") is provided by Planet Home Lending, LLC and its subsidiaries and affiliates ("Planet", "we" or "us").

This Notice explains how we collect, use, retain, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the CCPA.

Under the CCPA, "personal information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This information is referred to in this Notice as "Personal Data" or "Personal Information." Similarly, any reference to "service providers" within this notice also includes our "contractors."

"Sensitive personal information" is a subset of personal information, as applicable to data at Planet and means: (1) Personal information that reveals: (A) A consumer's social security, driver's license, state identification card, or passport number. (B) A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. (C) A consumer's precise geolocation. (D) A consumer's racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership. (E) The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication. (F) A consumer's genetic data.

Ensuring Personal Information is securely maintained is a priority at Planet. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Categories of Personal Data that We Collect

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide financial products and services, for our customers, for human resources, and for vendor management purposes.

The Personal Data that we collect about a specific California resident may vary somewhat based upon our relationship or interaction with that customer.

During the past 12 months, we have collected the following categories of Personal Data.

1. Identifiers, such as name and government-issued identifier, such as Social Security number and driver's license number;
2. Personal information, as defined in the California safeguards law, such as contact information and financial information;
3. Characteristics of protected classifications under California or federal law, such as sex and marital status;
4. Commercial information, such as transaction information and service history;
5. Internet or network activity information, such as browsing history and interactions with our website;
6. Audio, electronic, visual and similar information, such as recorded telephone calls;
7. Professional or employment-related information, such as work history and prior employer;
8. Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.
9. "Employment-related information" means personal information that is collected by the business about a natural person acting as a job applicant to, an employee of, or independent contractor of, that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, or an independent contractor of, that business.

Sources of Personal Data

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- From California residents directly, or other individuals acting on their behalf, through, for example, physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website) sources.

- Public records or widely available sources, including information made available by federal, state, and local government entities.
- Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers and data analytics providers.
- Outside companies or organizations from whom we collect Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved in transactions involving transfers of mortgage servicing accounts.

Why We Collect Personal Data and How We Use It

The purposes for which we collect, use, and disclose Personal Data may vary based upon the purposes for which we collect, use, and disclose the categories of Personal Data, listed above, or to our service providers for various business purposes, as permitted by law.

Purposes for Collection, Use and Disclosure	Examples
Provide and manage products and services	<ul style="list-style-type: none">▪ Establish and process transactions for our products and services, including online payment services▪ Support the ongoing management and maintenance of our products and services, including to provide account access, customer service, payments and collections, and account notifications▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions

<p>Manage, improve, and develop our business</p>	<ul style="list-style-type: none"> ▪ Market, personalize, develop, and improve our products and services ▪ Conduct research and analysis, including for product and services innovation ▪ Support customer relationship management ▪ Evaluate and engage in transactions involving transfers of all or part of our business, for example, mortgage servicing transfers ▪ Obtain support for fulfilling the above purposes from our service providers and from our professional services, business, and marketing partners
<p>Support employment, infrastructure, and human resource management</p>	<ul style="list-style-type: none"> ▪ Provide benefits to employees ▪ Manage pay and compensation activities ▪ Manage attendance, time keeping, leaves of absence, and vacation ▪ Manage and operate our facilities and infrastructure, including conducting risk and security control and monitoring activities ▪ Recruit new employees, process employment applications, and onboard new employees ▪ Perform identity verification, accounting, budgeting, audit, and other internal functions, such as

	<p>internal investigations, disciplinary matters, and handling grievances and terminations</p> <ul style="list-style-type: none"> ▪ Operate and manage IT and communications systems and facilities, allocate company assets and human resources, and undertake strategic planning and project management ▪ Conduct research, analytics, and data analysis, such as to assist in succession planning and to ensure business continuity ▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners
<p>Support our everyday operations, including to meet risk, legal, and compliance requirements</p>	<ul style="list-style-type: none"> ▪ Perform accounting, monitoring, and reporting ▪ Enable information security and anti-fraud operations, as well as credit, underwriting and due diligence ▪ Support audit and investigations and legal requests and demands, as well as exercise and defend legal claims ▪ Enable the use of service providers for business purposes ▪ Comply with laws, regulations, policies, procedures, and contractual obligations

	<ul style="list-style-type: none">▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners, and financial institutions▪ Operate and manage IT and communications systems and facilities, and allocate company assets
Support employment, infrastructure, and human resource management	<ul style="list-style-type: none">▪ Provide benefits to employees and dependents▪ Manage pay and compensation activities▪ Manage attendance, time keeping, leaves of absence, and vacation▪ Manage and operate our facilities and infrastructure▪ Recruit new employees, process employment applications, and onboard new employees▪ Internal investigations, disciplinary matters, and handling grievances and terminations▪ Allocate company assets and human resources▪ Operate and manage IT and communications systems and facilities▪ Conduct research, analytics, and data analysis, such as to assist in

	<p>succession planning and to ensure business continuity</p> <ul style="list-style-type: none"> ▪ Obtain support for fulfilling the above purposes from our third-party service providers, professional services and business partners
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We collect, use and disclose personal information and sensitive information, as permitted by applicable laws and regulations to:

- Perform services for our business, provide goods or services as requested by individuals
- Detect and investigate security incidents
- Use for short-term transient purposes, such as displaying first party, non-personalized advertising
- Process and fulfill orders, maintain and service accounts, provide customer service, verify customer information, process payments, and provide financing
- Conduct activities relating to quality and safety control or product improvement
- Support employment, infrastructure, and human resource management
- Counter wrongful or unlawful actions
- Collect and process, for purposes permitted by law, without inferring characteristics about an individual

Categories of Third Parties and Our Disclosure and Sharing of Personal Data

The categories of third parties to whom we disclose or share Personal Data about a specific individual depend on, among other things, our relationship or interaction with a specific California resident. Such third parties include:

- Outside companies or organizations, including service providers, to whom we disclose Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and

development. Examples may include property preservation companies, law firms, internet service providers, operating systems and platforms and data analytics providers; companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with transactions involving transfers of accounts or assets.

- Government agencies, including supporting regulatory and legal requirements
- Outside companies or organizations, including service providers, to whom we provide Personal Data to support human resource activities and workforce management. Examples may include recruiting, training, data analytics, and employee benefits providers.
- Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.
- Third-party marketing and advertising technology providers, advertising partners, and social media platform.

Data Retention

We will keep Personal Data, including Sensitive Personal Information, no longer than reasonably necessary to accomplish the purposes described in this Notice. Pursuant to our record retention policy, we destroy records containing Personal Data, including Sensitive Personal Information, according to specific periods in our retention schedule. However, we may need to hold such records beyond these retention periods as set forth in our record retention policy, due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matter.

Exercising Opt-Out, Information Requests or Data Deletion rights

The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration. Planet does not sell and has not sold, within the last 12 months, Personal Data, including Sensitive Personal Information. In addition, we do not sell or share Personal Data, including Sensitive Personal Information, of minors under 16 years of age.

If you are a California resident, you have the right to request:

1. The following information ("Request to Know"):

- a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
- b. The business or commercial purpose for collecting or sharing Personal Data about you;
- c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
- d. The categories of Personal Data about you that we shared and the categories of third parties with whom we shared such Personal Data; and
- e. The specific pieces of Personal Data we collected about you.

2. Deletion of Personal Data we collected from you ("Request to Delete").
3. Correction of inaccurate personal information that we maintain about you ("Request to Correct").

Non-Discrimination.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

1. Deny you services;
2. Charge you a different rate or offer different pricing including denying discounts or credits other benefits or imposing additional fees;
3. Provide you a different level of service;
4. Suggest that you may receive different price or rate for services or a different level of service.
5. Retaliate against you as an employee, applicant, or independent contractor for exercising your CCPA privacy rights.

How to Submit Requests

If you are a California resident, you can make a Request to Know, Delete, or Correct by:

Visiting the Planet Home Lending Website using the following link:

<https://planethomelending.com/privacy-policy/> and completing a Request Form under the CCPA Request Form (CA Residents Only) section. If you are unable to complete the form online or need assistance, please call 866-882-8187.

For all other individuals, we will ask you to provide the following information to identify yourself:

- Name, contact information, Social Security or individual taxpayer identification number, and date of birth; and
- A copy of a government-issued photo ID. We accept your driver's license or state ID.

When you make a Request to Know, Delete, or Correct, we will attempt to confirm your identity. For example, we will attempt to match information that you provide in making your request with other sources of similar information to reasonably verify identity. If we cannot verify the identity of the requestor pursuant to the CCPA regulations, we may deny the request to delete, however, we will inform the requestor that their identity cannot be verified.

To make a Request to Opt-Out of Sharing, submit a request through the following link:
<https://planethomelending.com/privacy-policy>. We process opt-out preferences as required by the CCPA. These preferences set the opt out of sharing preferences for the specific browser or device you are using.

Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we handle. When these other laws apply, Personal Data may be exempt from, or outside the scope of, a request to Know, Delete, or Correct.

For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act is exempt from CCPA Requests. As a result, we may decline all or part of your Request to the extent that it relates to exempt Personal Data. This means that we may not provide, delete, correct, or opt-out some, or all, of this Personal Data when you make a CCPA Request.

As examples, our processing of, or response to, a CCPA Request may not include some or all of the following Personal Data:

Consumer Accounts. Personal Data related to consumer accounts used for personal, family, or household purposes and applications for such accounts. We have other privacy notices providing certain information on use and sharing of this data, for example, the Planet Home Lending, LLC Privacy Notice, available at https://planethomelending.com/getmedia/3fd36521-84ad-4654-aed9-b7e9a799d6b7/2025_Privacy-Policy_Rev-10-07-25_.pdf

- In addition to the above examples, we may not include Personal Data when we respond to or process CCPA Requests when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request.

Authorized Agents

If you are a California resident, you may authorize another person in writing to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "How To Submit Requests." As part of our verification process, we may request that you provide, as applicable:

You may make a verifiable consumer request for access or data as far back as January 1, 2022. The verifiable consumer request requires you to provide for an individual ("requestor") making a request on behalf of a California resident:

1. First and Last Name
2. Email address; and
3. Last four digits of your social security number.

- For a company or organization ("legal entity requestor") making a request on behalf of a California resident:
 - Proof that the California resident has authorized the legal entity requestor to make the request. We may accept as applicable, a signed permission by the California resident on whose behalf the request is made, copy of power of attorney, or legal guardianship or conservatorship order.
 - The name; contact information; Social Security or individual taxpayer identification number; date of birth; and driver's license, state ID, or matricula card of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request.

Deidentified Information

Where we maintain or use deidentified information, we will continue to maintain and use the deidentified information in a deidentified manner and will not attempt to re-identify the information.

Changes to this Notice

We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was effective.

Planet Subsidiaries and affiliates Providing this Notice

This Notice is provided by Planet Home Lending, LLC and its subsidiaries that either: (1) act as a business within the meaning of the CCPA, or (2) are controlled by Planet or use our name. As an example, companies providing this Notice include Planet Insurance Agency, Inc., and others.

Contact Us

You may contact us with questions or concerns about this Disclosure by contacting us through one of the following methods:

1. Writing us at: Attention CCPA Response Team Planet Home Lending, LLC P.O. Box 1001 Meriden, CT 06450
2. Call us at 866-882-8187
3. If you would like to exercise your data protection rights or submit a request online, please complete our Privacy Request form by visiting:

<https://privacyportal-cdn.onetrust.com/dsarwebform/6c07ac5a-5046-44b9-a02e-457b735f7f6c/b94d95d2-c454-4d43-a470-b0d9b169f867.html>

4. Send us an email at cs@myloansupport.com with CCPA in the subject line.