# PRIVACY POLICY FOR CALIFORNIA RESIDENTS

*Last Updated: 06/26*

The State of California requires that we provide privacy information to individuals who reside in California. If you do not reside in California, you can skip this document.

For California residents, here is a summary of what you will learn from this privacy policy:

1. Personal Information We Collect (including Sensitive Personal Information)
2. How We Use and Disclose Your Personal Information
3. Sale and Sharing of Personal Information
4. How Long We Retain Your Personal Information
5. Your Rights Under California Law (Know, Correct, Delete, Opt-Out of Sale/Sharing, Limit Sensitive Personal Information, Non-Discrimination)
6. Submitting a Verified Consumer Request
7. Information Exempt From This Policy (GLBA / FIPA / FCRA)
8. Changes to This Privacy Policy
9. How to Contact Us

## Below is the legal information we are required to share:

This PRIVACY POLICY FOR CALIFORNIA RESIDENTS (the "Policy") supplements the applicable Privacy Policy of Quill Bank ("we," "us," or "our"), and specifically applies to the CC Flow Line of Credit program, located at www.ccflowonline.com ("Website"), provided by us in conjunction with our authorized servicers ("Program"). This Policy applies solely to visitors to the Website, users of the Program, and, as applicable, others who reside in the State of California ("consumers" or "you") and are not excluded based on the scope detailed in Section 7 *Information Exempt from this Policy*. We adopt this Policy to comply with the

California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the "CCPA"), regulations implementing CCPA, and, as applicable, other California privacy laws. Any terms used by not otherwise defined in this Policy have the meaning provided for under the CCPA.

# 1. Personal 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 household ("personal information").

## 1.1 Personal information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern;
- De-identified or aggregated consumer information; and
- Information excluded from the CCPA's scope, as described in Section 7 below (including most information collected, processed, sold, or disclosed subject to the Gramm-Leach-Bliley Act and its regulations, the California Financial Information Privacy Act, the Fair Credit Reporting Act, HIPAA/CMIA, and the Driver's Privacy Protection Act).

## 1.2 How we obtain your personal information

| | |
|---|---|
| Directly from you. | For example, contact information you enter or provide us with, your application for a loan, or documents you provide to verify your identity, whether online or by email, phone, or document upload. |
| Directly and indirectly from you based on activity on our website. | For example, submissions through our website or usage details collected automatically. |
| From vendors or third parties that interact with us in connection with the services we perform. | For example, companies that work with us to market our products to you, credit reporting agencies from which we check your credit in connection with a submitted application, or other vendors that provide data we use in underwriting or in protecting you and our products from fraud and identity theft. |

## 1.3 Categories of personal information collected in the preceding 12 months

Within the last 12 months we collected the categories of personal information listed below and disclosed them as follows. The numbers in the "Purpose" column refer to the business and commercial purposes listed in Section 2.1.

| Category | Examples | Collected (Yes/No) | Sources | Purpose (Sec. 1.3 #) | Recipients |
|---|---|---|---|---|---|
| **A. Identifiers** | Real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, or similar identifiers. | Yes | You; your activity on our site; vendors and third parties | 1–9 | Our service providers, and third parties |
| **B. Personal information (Cal. Civ. Code § 1798.80(e))** | Name, signature, Social Security number, physical description, address, telephone number, passport number, driver's license or state ID number, insurance policy number, education, employment and employment history, bank account number, credit/debit card number, or other financial information. May overlap with other categories. | Yes | You; vendors and third parties | 1–9 | Our service providers, and third parties |
| **C. Protected classification characteristics** | Age (40+), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity/expression, pregnancy and | Yes | You; vendors and third parties | 1, 2, 4–9 | service providers, and third parties |

| Category | Examples | Collected (Yes/No) | Sources | Purpose (Sec. 1.3 #) | Recipients |
|---|---|---|---|---|---|
| | related conditions), sexual orientation, veteran or military status, genetic information. | | | | |
| **D. Commercial information** | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Yes | You; vendors and third parties | 1–9 | Our service providers, and third parties |
| **E. Biometric information** | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract an identifier (e.g., fingerprints, faceprints, voiceprints, iris/retina scans, keystroke/gait patterns, sleep/health/exercise data). | No | N/A | N/A | N/A |
| **F. Internet or other network activity** | Browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement. | Yes | Your activity on our site; vendors and third parties | 1–9 | Our service providers, and third parties |
| **G. Geolocation data** | Physical location or movements. | Yes | Vendors and third parties | 1, 2, 5–9 | Our service providers, and third parties |
| **H. Sensory data** | Audio, electronic, visual, thermal, olfactory, or similar information. | Yes | You | 1–9 | Our service providers, and third parties |

| Category | Examples | Collected (Yes/No) | Sources | Purpose (Sec. 1.3 #) | Recipients |
|---|---|---|---|---|---|
| **I. Professional or employment-related information** | Current or past job history or performance evaluations. | Yes | You; vendors and third parties | 1, 2, 4, 6–9 | Our service providers, and third parties |
| **J. Non-public education information (FERPA)** | Education records directly related to a student maintained by an educational institution or party acting on its behalf. | No | N/A | N/A | N/A |
| **K. Inferences** | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No | N/A | N/A | N/A |

## 1.4 Sensitive Personal Information

Some of the information we collect is "sensitive personal information" under the CCPA. We collected the following categories of sensitive personal information in the preceding 12 months:

| Sensitive Personal Information Category | Collected (Yes/No) | Sources | Disclosure / Recipients |
|---|---|---|---|
| Social Security number, driver's license, state ID, or passport number | Yes | You; vendors and third parties | Our service providers, and third parties |

| Sensitive Personal Information Category | Collected (Yes/No) | Sources | Disclosure / Recipients |
|---|---|---|---|
| Account log-in, financial account, debit or credit card number in combination with any required security or access code, password, or credentials allowing access to an account | Yes | You; vendors and third parties | Our service providers, and third parties |
| Precise geolocation | Yes | Vendors and third parties | Our service providers, and third parties |
| Racial or ethnic origin, religious or philosophical beliefs, or union membership | No | N/A | N/A |
| Contents of mail, email, and text messages (unless we are the intended recipient) | No | N/A | N/A |
| Genetic data; biometric information processed to uniquely identify a consumer | No | N/A | N/A |
| Personal information concerning health, sex life, or sexual orientation | No | N/A | N/A |

We use and disclose sensitive personal information only for the purposes permitted by Cal. Civ. Code § 1798.121 and the CCPA regulations — for example, to perform the services or provide the products you request (such as originating, underwriting, and servicing your loan), to verify your identity, to detect and prevent fraud and security incidents, and to comply with applicable law. We do not use or disclose sensitive personal information for purposes other than those permitted by Section 1798.121(a); accordingly, the “Right to Limit” described in Section 5.5 does not apply.

# 2. How We Use and Disclose Your Personal Information

## 2.1 Business and commercial purposes

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

1. To fulfill or meet the reason for which the information is provided.
2. To provide you with information, products, or services that you request from us.
3. To provide you with email alerts and other notices concerning our products or services, or events or news that may be of interest to you.
4. To carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collections.
5. To improve our website and present its contents to you.
6. For testing, research, analysis, and product development.
7. As necessary or appropriate to protect the rights, property, or safety of you, us, or others, including to detect security incidents and protect against fraudulent, deceptive, or illegal activity.
8. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
9. 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 or disclose the personal information or sensitive personal information we collected for materially different, unrelated, or incompatible purposes, without first providing you with notice.

## 2.2 Who we disclose personal information to

We may disclose your personal information to a service provider, contractor, or third party for a business or commercial purpose. When we disclose personal information to a service provider or contractor, we enter into a contract that describes the purpose and requires the recipient to keep that personal information confidential and not use it for any purpose except performing the contract. Categories of recipients include:

- Our affiliates;
- Service providers and contractors (for example, identity-verification, underwriting, servicing, fraud-prevention, hosting, and analytics providers); and
- Third parties to whom you or your authorized agents direct us to disclose your personal information in connection with products or services we provide to you.

In the preceding 12 months, we disclosed the categories of personal information identified in Sections 1.3 and 1.4 to service providers and contractors for the business purposes described in Section 2.1.

## 3. Sale and Sharing of Personal Information

The CCPA gives consumers the right to opt out of the "sale" of personal information and the "sharing" of personal information for cross-context behavioral advertising. Under the CCPA:

- "Sale" means disclosing personal information to a third party for monetary or other valuable consideration.
- "Sharing" means disclosing personal information to a third party for cross-context behavioral advertising, whether or not for consideration.

We do not sell, and have not sold in the preceding 12 months, your personal information. We do not share, and have not shared in the preceding 12 months, your personal information for cross-context behavioral advertising. We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

## 4. How Long We Retain Your Personal Information

We retain each category of personal information and sensitive personal information for as long as reasonably necessary to fulfill the purposes for which it was collected (as described in Section 2.1), and we do not retain personal information longer than is reasonably necessary and proportionate for those purposes. We determine the appropriate retention period using the following criteria:

- The duration of our relationship with you and the time needed to provide and service the product or loan you requested;

- Whether there is a legal, regulatory, tax, accounting, or recordkeeping obligation that requires retention (for example, obligations applicable to federally insured depository institutions and consumer lenders);
- Whether retention is advisable in light of our legal position (for example, applicable statutes of limitations, litigation, or regulatory inquiries); and
- Whether the information is necessary to detect and prevent fraud or to maintain the security of our systems and records.

# 5. Your Rights Under California Law

The CCPA provides California residents with the following rights regarding their personal information. This section describes those rights and how to exercise them.

## 5.1 Right to Know and Data Portability

You have the right to request that we disclose to you the personal information we have collected about you. Once we receive and confirm your verifiable consumer request, we will disclose:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information was collected;
- Our business or commercial purpose for collecting, selling, or sharing that personal information;
- The categories of third parties to whom we disclosed that personal information; and
- The specific pieces of personal information we collected about you (a data portability request).

Your request will cover the 12-month period preceding our receipt of the request. You may also request that we disclose personal information we collected beyond that 12-month period, and we will provide it unless doing so proves impossible or would involve disproportionate effort. If we are unable to provide information beyond the 12-month period, we will still provide the information for the standard 12-month lookback period and explain the basis for our inability to comply with the broader request. This right to information beyond 12 months applies only to personal information collected on or after January 1, 2022. Nothing in the CCPA requires us to retain personal information for any particular length of time.

We may deny your request if we are unable to verify your identity or have reason to believe the request is fraudulent.

## 5.2 Right to Correct

You have the right to request that we correct inaccurate personal information that we maintain about you, taking into account the nature of the personal information and the purposes of processing it. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct the inaccurate information as you direct, unless an exception applies (for example, where we have a good-faith, reasonable, and documented belief that the request is fraudulent or abusive, or where the accuracy of the information is the subject of a dispute). We may request documentation to support a correction request.

## 5.3 Right to Delete

You have the right to request that we delete personal information we have collected from you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers and contractors 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, our service providers, or our contractors to:

- Complete the transaction for which the information was collected, provide a good or service you requested or reasonably anticipated within our ongoing business relationship with you, or otherwise perform a contract between us and you;
- Help to ensure security and integrity, and to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to applicable ethics and privacy laws, when deletion is likely to render impossible or seriously impair the research, and you have provided informed consent;
- Enable solely internal uses reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information; or

- Comply with a legal obligation.

We may also deny your request if we cannot verify your identity or have reason to believe the request is fraudulent.

## 5.4 Right to Opt-Out of Sale or Sharing

You have the right to direct us not to sell or share your personal information. As described in Section 3, we do not sell your personal information and do not share it for cross-context behavioral advertising; therefore, no opt-out mechanism is necessary at this time. If our practices change such that we sell or share personal information, we will update this Policy and provide a clear and conspicuous "Do Not Sell or Share My Personal Information" link and honor opt-out preference signals.

## 5.5 Right to Limit the Use and Disclosure of Sensitive Personal Information

You have the right to direct us to limit our use and disclosure of your sensitive personal information to those uses permitted by Cal. Civ. Code § 1798.121. As described in Section 1.4, we use and disclose sensitive personal information only for purposes that are exempt from the Right to Limit (such as providing the products and services you request, verifying identity, preventing fraud, ensuring security, and complying with law). For that reason, we are not required to offer, and do not currently offer, a "Limit the Use of My Sensitive Personal Information" option. If our use of sensitive personal information changes, we will update this Policy and provide a clear and conspicuous "Limit the Use of My Sensitive Personal Information" link.

## 5.6 Right to 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; or
- Suggest that you may receive a different price or rate, or a different level or quality of goods or services.
- We do not currently offer any financial incentive programs (such as loyalty, rewards, premium features, or price or service differences) that require the collection, retention, sale, or sharing of your personal information as a condition of

participation. If we offer any such programs in the future, we will notify you of the material terms, provide an opt-in mechanism, and explain how we calculated the value of your personal information.

# 6. Submitting a Verified Consumer Request

## 6.1 Exercising your Right to Know, Correct, Data Portability, and Delete

To exercise the access, correction, data portability, and deletion rights described above, please submit a verifiable consumer request to us by one of the following methods:

| **Right to Know / Correct** | **Right to Delete** |
|---|---|
| • Calling us at 844-507-8270<br>• Emailing us at requestmyccinfo@ccflowonline.com<br>• Visiting www.ccflowonline.com | • Calling us at 844-827-1265<br>• Emailing us at deletemyccinfo@ccflowonline.com<br>• Visiting www.ccflowonline.com |

Only (1) you, (2) a person authorized by you to act on your behalf, or (3) a business entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a verifiable consumer request related to your personal information.

You may make a verifiable request to know or for data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information, or an authorized representative. Given the sensitivity of the personal information we collect and retain, we will need to verify your identity with at least three separate pieces of information, such as name, address, account number, date of birth, last four digits of your Social Security number, or phone number; and
- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

If we retain personal information about you for longer than 12 months, you may request access to personal information we collected beyond the 12-month period preceding your request (back to January 1, 2022), and we will provide it unless doing so proves impossible or would involve disproportionate effort.

## 6.2 Authorized agents

Before we can respond to a verifiable consumer request submitted by an authorized agent, we must confirm the agent's authority to act on your behalf and verify the agent's identity. If you are authorized to submit a request on behalf of a California resident, please email us at requestmyccinfo@ccflowonline.com (to request information) or deletemyccinfo@ccflowonline.com (to request deletion) and provide:

1. To verify your authorization, a copy of one or more of the following:
    - A California Secretary of State authorization
    - Written permission signed by the California resident, or
    - A power of attorney

2. To verify your identity:
    - Copies of a valid (unexpired) government-issued ID **AND**
    - A utility bill, bank statement, or similar documentation verifying your name and address; and

3. To verify the identity of the consumer on whose behalf you are submitting the request, two or more of the following (three or more are required for a data portability request):
    - Valid (unexpired) government-issued ID
    - Utility bill
    - Bank statement
    - Email address
    - Last 4 digits of the SSN, or
    - Last 4 digits of the account number

We cannot respond to your request or provide personal information if we cannot verify your identity or authority and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority.

### 6.3 Response timing and delivery method

We will acknowledge receipt of your request within 10 business days. We will respond to a verifiable consumer request within 45 days of receipt. If we require more time (up to a total of 90 days), we will inform you of the reason and the extension period in writing. If you have an account with us, we will deliver our written response by email; if you do not, we will deliver it by mail or electronically, at your option. For data portability requests, we will provide the information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information 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 a request warrants a fee, we will tell you why and provide a cost estimate before completing your request.

## 7. Information Exempt From This Policy

CC Flow lines of credit are made by Quill Bank, a financial institution subject to the Gramm-Leach-Bliley Act ("GLBA"). Personal information subject the GLBA are governed by our GLBA Privacy Policy available at www.ccflowonline.com**.** The CCPA does not apply to personal information collected, processed, sold, or disclosed subject to the GLBA and its implementing regulations, or to the California Financial Information Privacy Act ("FIPA"); nor does it apply to information collected, processed, sold, or disclosed subject to the Fair Credit Reporting Act ("FCRA"), to medical information governed by HIPAA or the California Confidentiality of Medical Information Act, or to information governed by the Driver's Privacy Protection Act.

Because much of the information we collect to evaluate, originate, and service a loan is subject to the GLBA or FIPA, that information is generally exempt from the CCPA rights described in Section 5 (although the CCPA's data-breach provisions may still apply). The CCPA does, however, apply to personal information we collect that is not subject to these laws — for example,

information collected through our general website and marketing activities that is not collected in connection with providing a financial product or service to you. The disclosures and rights in this Policy apply to that non-exempt personal information.

## 8. Changes to This Privacy Policy

We reserve the right to amend this Policy at our discretion and at any time. We will review and update this Policy at least once every 12 months. When we make material changes, we will post the updated policy with a revised “Last Updated” date and notify you by email or through a notice on our website homepage prior to the changes taking effect.

## 9. How to Contact Us

If you have any questions or comments about this Policy, the ways in which we collect and use your personal information, your rights, or wish to exercise your rights under California law, please contact us at:

Privacy Support Phone: 833-325-4854

Privacy Support E-Mail: requestmyccinfo@ccflowonline.com

Website: www.ccflowonline.com

Postal Address:

CC Flow
Attn: CC Flow Servicer
205 Sugar Camp Circle, Dept. CCF
Dayton, Ohio 45409