Effective Date 1/1/2021

PRIVACY POLICY FOR CALIFORNIA RESIDENTS

The state of California requires that we provide privacy information for individuals that 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:

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   1.2. How we obtain your personal information
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Below is the legal information we are required to share:

This PRIVACY POLICY FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of Total Loan Services, LLC, an Ohio limited liability company (collectively, “we,” “us,” or “our”), which can be located at www.gettotal.com. This PRIVACY POLICY FOR CALIFORNIA RESIDENTS applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this policy.

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 an individual consumer or device (“personal information”).

1.1. Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

1.2. How We Obtain Your Personal Information:

Directly from you.	You enter or provide us with information, whether online or by email, phone or document upload. For example, your contact information that you provide, your application for a loan from a lender, or documents you provide to verify your identity.
Directly and indirectly from you based on activity on our website.	For example, from submissions through our website or website 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 lenders' products to you, credit reporting agencies from which we check your credit on behalf of a lender in connection with a submitted application, or other vendors that provide data lenders use in underwriting or in protecting you and lenders' products from fraud and identity theft.

1.3. How We Use Your Personal Information:

We may use or disclose the personal information we collect for one or more of the following business 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 entered into between you and us, or you and a lender, 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.
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 the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

1.4. Who We Share Your Personal Information with for a Business or Commercial Purpose:

We may disclose your personal information to a lender, service provider, or third party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract. Examples of who we share with include:

- Our affiliates and lenders.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products of lenders or services we provide to you.

1.5. Within the last 12 months we collected the categories of personal information listed below and shared it as follows:

CATEGORY	EXAMPLES	COLLECTED (Yes/No)	SOURCES OF COLLECTED PERSONAL INFORMATION	BUSINESS OR COMMERCIAL PURPOSE FOR SHARING (Section 1.3 #1-9, above)	CATEGORY OF THIRD PARTIES
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.	YES	You, your activity on our site, or from vendors and third-parties	1-9	Our lenders, service providers and third-parties
B. Personal information	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, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES	You, or vendors and third-parties	1-9	Our lenders, service providers and third-parties

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, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES	You or vendors and third-parties	1, 2, 4-9	Our lenders, service providers and third-parties
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	You or vendors and third-parties	1-9	Our lenders, service providers and third-parties
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, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A	N/A	N/A
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Your activity on our site or vendors and third-parties	1-9	Our lenders, service providers and third-parties
G. Geolocation data.	Physical location or movements.	YES	Vendors and third-parties	1, 2, 5-9	Our lenders, service providers and third-parties
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	You	1-9	Our lenders, service providers and third-parties

I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES	You or vendors and third-parties	1, 2, 4, 6-9	Our lenders, service providers and third-parties
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 schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A	N/A	N/A
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A	N/A	N/A

1.6. Sale of Personal Information:

We do not and will not sell your personal information. We do not and will not sell the Personal Information of minors under 16 years of age without affirmative authorization.

2. YOUR RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT OF 2018

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

2.1. Right to Know and Data Portability Rights:

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. Once we receive and confirm your verifiable consumer request for access, 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 sharing 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 (also called a data portability request).
- If we disclosed your personal information for a business purpose, the categories of personal information shared with each category of recipients.

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

2.2. Right to Delete:

You have the right to request that we delete any of your personal information that we collected and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers or third parties to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the personal information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- 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.
- 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 the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Additionally, we may deny your request to delete if we are unable to verify your identity or have reason to believe that the request is fraudulent.

2.3. Right to Opt-Out:

The CCPA provides consumers with the right to opt-out of the sale of your personal information. However, we do not and will not sell your personal information. We do not and will not sell the Personal Information of minors under 16 years of age without affirmative authorization.

2.4. 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.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

3. SUBMITTING A VERIFIED CONSUMER REQUEST

3.1. Exercising Right to Know, Data Portability, and Right to Delete:

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

Right to Know

- Calling us at (833)708-0373
- Emailing us at requestmyinfo@gettotal.com
- Visiting www.gettotal.com

Right to Delete

- Calling us at (833)708-0372
- Emailing us at deletemyinfo@gettotal.com
- Visiting www.gettotal.com

Making a verifiable consumer request does not require you to create an account with us. However, if you already have an existing online account, we will require you to log in to submit a request.

Only 1) you, 2) a person authorized by you to act on your behalf, or 3) an 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 also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access (aka Right to Know) or data portability 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. Given the sensitivity of your personal information that we collect and retain, we will need to verify your identity with at least 3 separate pieces of information such as name, address, account number, date of birth, last 4 of your Social Security Number, phone number, etc.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

3.2. Authorized Agents:

Before we can respond to a verifiable consumer request submitted by an authorized agent, we need to confirm not only that person or entity's authority to act on behalf of a consumer and verify the identity of the authorized agent. If you are authorized to submit a request on behalf of a California resident, please email us at requestmyinfo@gettotal.com to request information collected or requestmyinfo@gettotal.com to request deletion of information and provide the following information:

1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:

    - California Secretary of State authorization,
    - Written permission from the California resident, or
    - Power of attorney

2. To verify your identity, please attach copies of the following to your request email:

    - Valid Government Issued ID (not expired) **AND**
    - A Utility Bill, Bank Statement, or similar documentation to verify your name and address

3. To verify the identity of the consumer for whom you are submitting the request, please attach **two or more** of the following with your request email (three or more are required when requesting a copy of the resident's personal information (aka a data portability request)):

    - Valid Government Issued ID (not expired),
    - Utility bill,
    - Bank statement,
    - Email address,
    - Last 4 of the SSN, or
    - Last 4 digits of your account number

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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

3.3. Response Timing and Delivery Method:

We will acknowledge receipt of the request within 10 days of its receipt. We will respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response by email. 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. For data portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable 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 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.

4. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will notify you by email or through a notice on our website homepage.

5. 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 regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Privacy Support Phone:	(833)270-0770
Privacy Support E-Mail:	requestmyinfo@gettotal.com
Website:	www.gettotal.com
Postal Address:	Total Loan Services, LLC 205 Sugar Camp Circle Dayton, Ohio 45409