

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE

LERETA, LLC (“LERETA”, “we” or “us”) is an industry leading real estate tax and flood determination service provider to lenders and mortgage servicers of residential and commercial loans. We provide business to business products and services and do not offer products or services directly to consumers. The privacy notices of your lender or mortgage servicer applies to you and you should refer to those privacy notices and/or contact your lender or mortgage servicer to understand how your Personal Information will be used by them. This Privacy Notice explains how we collect, use, share and protect personal information we process on California residents as a service provider under the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CRPA”).

Personal Information Collected by Us as a Service Provider

When we collect or receive and process Personal Information about consumers, we do so as a service provider solely to provide our services to lending institutions and mortgage service providers. The category of Personal Information we collected or may have collected in the last 12 months is:

- Identifiers – name, postal or property address, loan number and financial account information such as your outstanding mortgage loan balance
- Contact information or account information you may provide to us to respond to an inquiry you make, such as email address or phone number
- Loan account information while providing certain call center services to lending institutions and mortgage service providers

Under the CCPA, Personal Information does not include:

- Publicly available information from federal, state and local government records
- De-identified or aggregated consumer information.
- Information excluded from the scope of the CCPA, such as personal information covered by certain sector specific privacy laws such as the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.

We may also collect browsing information from your Internet browser, computer, and/or mobile device if you visit or use our website, including, but not limited to, information about your estimated location as may be determined from the IP address, Internet Protocol (IP) address or device ID/UDID, protocol and sequence information, browser language and type, domain name system requests, browsing history (such as time spent at a domain, time and date of your visit and number of clicks), http headers, application client and service banners and operating system data (collectively, “Browsing Information”). The Browsing Information includes only generic information and reveals nothing personal about the user.

We do not require or use Sensitive Personal Information from our lending institution and mortgage servicer clients in order to provide our real estate tax and flood determination services to them.

Sources of Personal Information

The sources of Personal Information from which we collected or may have collected your Personal Information in the last 12 months:

- Your lending institution or mortgage servicer when they provide us with the information that they collected from you. We receive only that information which is necessary for us to provide our services to them.
- Public records maintained by federal, state or local governmental entities. This includes information such as real property ownership, tax assessments, and assessed property values.
- Any unaffiliated third party or service provider we engage to assist us in performing services for lending institutions and mortgage service providers.
- Parcel or property data base aggregators.
- Directly from you or your authorized agent either verbally or in written correspondence when you contact us for customer support or make an inquiry.
- Directly from you or your authorized agent verbally while we are providing services to your lending institution or mortgage servicer.
- We may collect Browsing Information from the use of cookies and similar technologies. A cookie is an element of data that an Internet site can send to your browser, which may then store the cookie on your hard drive.

This Personal Information is Collected for the Following Business Purposes

When we collect or receive and process Personal Information about consumers, we do so as a service provider solely to provide our services to lending institutions and mortgage service providers. As a service provider, we collect and use or may collect and use such Personal Information:

- To carry out our contractual obligation to provide services to your lending institution or mortgage service provider
- To provide your lending institution or mortgage service provider with reporting on our performance
- For authentication purposes when you call us for customer support
- To respond to your inquiries, questions or other requests
- To comply with legal obligations
- To protect against deceptive, fraudulent or illegal activity
- To detect, prevent and respond to security incidents

- For quality monitoring and to comply with our contractual obligations to your lending institution or mortgage service provider, we may keep a record of any telephone conversation of yours with us
- If Browsing Information is collected, it is collected to better serve you if you visit our website, save you time if you visit our website and to provide you with a more meaningful and productive website experience

Categories of Third Parties with Whom We Share such Personal Information

When we collect or receive and process Personal Information about consumers, we do so as a service provider solely to provide our services to lending institutions and mortgage service providers. As a service provider, we do not share such Personal Information with third parties and have not during the past 12 months shared Personal Information with third parties other than:

- The lending institutions and mortgage servicers with whom we contracted to provide services
- Unaffiliated third parties with whom we contract to assist us in performing services for our lending institution and mortgage servicer clients. These third parties cannot use the Personal Information for their own purposes, are authorized to use your Personal Information only as necessary to provide services to us and are subject to appropriate confidentiality obligations.
- Unaffiliated third parties providing services to government agencies or as may be necessary for us to provide the services your lending institution or mortgage servicer has requested of us
- Law enforcement or other governmental authorities in connection with an investigation
- In response to legal process, civil or criminal subpoenas, court orders, or discovery
- To satisfy or comply with applicable laws or regulations
- To establish or exercise our rights or defend legal claims
- Our auditors
- Government agencies, such as tax assessors, in connection with performing our services on behalf of lending institutions and mortgage servicers.
- As directed by our lending institution or mortgage servicer client
- Other parties to whom you or your authorized agent give consent to us to share your Personal Information
- To facilitate a merger or the acquisition of our company, business or our assets

We reserve the right to share your Personal Information in connection with the potential sale or other disposition of our business or with potential third-party investors in us.

The privacy notices of your lending institution or mortgage servicer shall apply to you and you should refer to those privacy notices and/or contact your lending institution or

mortgage servicer to understand how your Personal Information is collected, shared and used by them.

Any Browsing Information about you that we may collect through a cookie is not shared with anyone.

Sale of Personal Information

LERETA does not sell Personal Information in exchange for monetary compensation or other valuable consideration. We have not sold Personal Information in the last 12 months. We have also not sold any Browsing Information in the past 12 months. LERETA does not share Personal Information for cross-contextual behavioral advertising purposes.

Personal Information of Minors

LERETA does not intentionally collect Personal Information from any person we know to be under the age of sixteen (16) without permission from a parent or legal guardian. We do not offer services to children.

Right to Request to Know Personal Information Collected or Disclosed

The CCPA provides California residents with the right to request a business disclose what Personal Information it collects, uses, discloses and sells and how to exercise those rights. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your consumer request rights as they are responsible for complying with such request related to your Personal Information.

Right to Request Deletion of Personal Information

The CCPA provides California residents with the right to request that their Personal Information be deleted. As a service provider we cannot act on any request you make directly to us to delete any of your Personal Information since retaining that information is necessary for us to fulfill the services we provide to your lending institution or mortgage servicer. Your lending institution or mortgage servicer, not us, is the owner and controller of your Personal Information and you should contact them directly if you wish to have your Personal Information deleted as they are responsible for taking action on a consumer request to delete Personal Information. In the event deletion is necessary, your lending institution or mortgage servicer will communicate that request to us so that we may update our records.

Right to Rectification (Correct Your Personal Information)

The CRPA provides California residents with the right to request that Personal Information be modified or rectified if it is inaccurate. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your right to request a correction to your Personal Information as they are responsible for complying with such request.

Right to Non-Discrimination

California residents have a right not to be discriminated against by exercising their consumer privacy rights. We will not discriminate against you for exercising any of your CCPA rights.

Right to Use an Authorized Agent

California residents may use an authorized agent to submit a request to know or a request to delete their information. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your right to designate an authorized agent and to understand any requirements they may impose before allowing an authorized agent to act on your behalf as they are responsible for complying with consumer request rights related to such Personal Information.

Contact Information

If you have any questions or concerns regarding this CCPA Privacy Notice and the ways in which we collect, use and disclose your Personal Information, please do not hesitate to contact us by calling us Toll Free at 833-760-0290.

Retention of Personal Information

We generally retain information on the services we provide regarding a property owner's real estate property taxes or flood determinations for at least 10 years from the date of our last interaction, in compliance with our obligations under applicable laws, or for longer if required to do so according to our regulatory obligations, client requirements, or where we believe necessary to resolve disputes, establish, defend or protect our legal rights or those of others or to protect against fraudulent, deceptive or illegal activity or for another one of our business purposes.

Security

We are committed to protecting the Personal Information of our client's customers. We implement physical, administrative and technical safeguards reasonably designed to

help us protect against unauthorized access, use and disclosure of such Personal Information. We also require our unaffiliated third-party service providers to protect such Personal Information from unauthorized access, use and disclosure. We encrypt Personal Information when we transmit such information over the Internet. We also take reasonable steps to prevent and detect unauthorized intrusions into our systems.

HR Data Subjects

We collect personal information concerning our current and former employees as well as certain others such as independent contractors (“HR Data Subjects”). HR Data Subjects should refer to the privacy statements available on LERETA’s Intranet for information on the collection and processing of their personal information in relation to their role with LERETA.

Changes to Our CCPA Privacy Notice

We reserve the right to amend this CCPA Privacy Notice in our sole discretion at any time. When we make changes to this CCPA Privacy Notice, we will post the updated CCPA Privacy Notice on our website and update its effective date.

This CCPA Privacy Notice was last updated on December 31, 2022.