# **Notice at Collection and Privacy Policy**

Effective Date: July 1, 2024

Last Reviewed/Revised on: July 1, 2024

This Multi-State Notice at Collection and Privacy Policy ("State Privacy Disclosure") explains how Newrez LLC d/b/a Shellpoint Mortgage Servicing and its subsidiaries and affiliates ("Company", "us", "our", or "we") collects, uses, discloses, sells, shares, and retains personal information ("Information Practices") subject to applicable U.S. state privacy laws.

Certain states provide specific rights to their residents as listed below. While we will attempt to respond to a request from any U.S. resident, we reserve the right to deny requests if allowed under applicable law.

U.S. state privacy laws do not apply to certain information collected by our financial services subsidiaries or affiliates, such as information subject to the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, and certain other state or federal privacy laws. For example, this State Privacy Disclosure does not apply to information that we collect about individuals who seek, apply for, or obtain our financial products and services for personal, family, or household purposes. If Company services your mortgage loan, please refer to the financial privacy notices for consumers of personal, household or family financial product or services that was provided to you by mail.

Unless you are a California resident, any rights that may be available in your state are not afforded to you under this State Privacy Disclosure while you are operating in your commercial or employment capacity. This CCPA Disclosure does not apply to information we collect in the context of an individual's interaction with us as a job applicant, employee, contractor, or other role within the Company. Please refer to our CCPA Workforce Disclosure on our Careers homepage.

The terms used in this State Privacy Disclosure shall have the same or similar meaning as those terms in each of the applicable laws, or the closest approximation of such terms.

## **Notice at Collection**

The purpose of this Notice at Collection is to provide you with timely notice, at or before the point of collection, about the categories of personal information we may collect from you and the purposes for which the personal information may be used, including whether that information is sold or shared. Please note that most of the information we use is in the context of providing financial products and services for personal, family, or household purposes, and is therefore not subject to U.S. state privacy laws.

# **General Personal Information**

Categories of Personal Information	Purposes for Collection and Use	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
Identifiers: For example, a real name, alias, postal address, Internet Protocol ("IP") address, email address, or other similar identifiers.  Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, Social Security number, address, telephone number, or financial information.	<ul> <li>To fulfill or meet the reason for which the information is provided</li> <li>For our internal operation purposes</li> <li>For auditing relating to consumer transactions including ad impressions and compliance with regulations</li> <li>Fraud and security detection</li> <li>Debugging to identify and repair errors</li> </ul>	We share/sell IP addresses and other similar identifiers with web analytics providers and third-party cookie and tracking technology providers to provide personalized ads.
Characteristics of CA or Federal Protected Classifications: For example, demographic information, age (40 and over), disability status, veteran status.  Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	<ul> <li>Short-term data use for the current interaction that is not used to build a profile</li> <li>For advertising and marketing purposes</li> <li>Performing services on behalf of the business, including maintaining or servicing accounts, providing products or services, providing customer service, processing orders or transactions, verifying customer</li> </ul>	We share/sell information relating to your interaction with our website with web analytics providers and third-party cookie and tracking technology providers to provide personalized ads.
Geolocation Data: For example, information that can be used to determine a device's physical location  Sensory or Surveillance Data: For example, call recordings or other audio,	<ul> <li>information, processing payments, providing financing, providing analytic services, storage, or other similar services</li> <li>Undertaking internal research for technological development and demonstration</li> </ul>	We share/sell this category of information with web analytics providers and third-party cookie and tracking technology providers to provide personalized ads.  No

electronic, or visual monitoring or surveillance.  Professional or Employment-Related Information: For example, current and past compensation, evaluations, performance reviews, personnel files, and current and past job history.	Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is	No
Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	service or device that is owned, manufactured, manufactured for, or controlled by the business.  To share the personal information with service providers to carry out other business purposes.	No

**We do not collect:** commercial information, biometric information or education information (as defined in the Family Education Rights and Privacy Act).

## **Sensitive Personal Information**

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under U.S. state privacy laws. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

Categories of Sensitive Personal Information	Purposes for Collection and Use	Sold to or Shared with Third Parties for Cross-Context Behavioral Advertising
Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul> <li>To perform services or provide goods you request and reasonably expect from us</li> <li>To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</li> <li>To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided</li> </ul>	No

Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul> <li>To perform services or provide goods you request and reasonably expect from us</li> <li>To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</li> </ul>	No
Racial or ethnic origin, religious or philosophical beliefs	We collect racial and ethnic origin information on loan application per federal legal requirements.	No

We do not collect: precise geolocation; contents of a consumer's mail, email, and text messages (unless we are the intended recipient of the communication); genetic data; biometric information for the purpose of unique identification; health information; information concerning sex life or sexual orientation.

#### **Retention Periods**

We retain each category of personal information for different periods of time depending on the purposes for which we collect and use it. In each case, we will only retain the personal information for as long as reasonably necessary to achieve the purposes for which we collected, used, or disclosed it, unless a longer retention period is required to comply with applicable legal and regulatory requirements. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing your information.

## Notice of Sale and/or Share

Our use of tracking technologies may be considered a sale or sharing with third parties for cross-context behavioral advertising (e.g. targeted advertising) under applicable state law. You can opt-out of being tracked by these third parties by clicking the "Do Not Sell or Share My Personal Information" link and selecting your preferences, as described in our "Right to Opt-Out of Sale/Sharing" notice in our Privacy Policy. Please note that this link provides opt-out rights under all applicable state laws, also known as "opt-out rights" or "personal data use opt-out".

Please review our Multi-State Privacy Policy below.

# **Privacy Policy**

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our Information Practices. You have certain rights to control the use of your personal information. This privacy policy describes your rights as it relates to our Information Practices as to your personal information and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months of: categories of personal information we may have collected about consumers, the categories we may have disclosed for a business purpose, and categories of third parties with whom we may have shared the personal information during that period.

## **General Personal Information**

The following categories have been collected and disclosed to third parties in the preceding 12 months	Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<ul> <li>For our operational purposes or the operational purposes of our service provider or contractors.</li> <li>Keeping track of visitors to our website and monitoring the effectiveness of our advertising, including auditing relating to counting ad impressions of unique visitors, verifying positioning and quality, and auditing compliance.</li> <li>Ensuring security and integrity as needed and as reasonably necessary and proportionate for this purpose.</li> <li>Debugging to identify and repair errors that impair existing functionality.</li> <li>Short-term, transient use</li> <li>Performing services on behalf of the business, including maintaining or servicing accounts, providing products or services, providing customer service, processing orders or transactions,</li> </ul>	<ul> <li>Cloud storage providers</li> <li>Payment processors</li> <li>Web analytics providers</li> <li>Web hosting service providers</li> <li>E-mail distribution service providers</li> <li>Help Desk service providers</li> <li>Financial and accounting service providers</li> <li>Cybersecurity service providers</li> <li>Logistics and planning tool providers</li> <li>Customer relationship management tool providers</li> <li>Business partners used throughout the loan origination process and the servicing of your loan, for example: real estate appraisers, credit reporting agencies, title insurance companies, auditors, property preservation companies, foreclosure law</li> </ul>

	verifying customer information, processing payments, providing financing, providing analytic services, storage, or other similar services.  Providing advertising and marketing services.  Undertaking internal research for technological development.  Undertaking activities to verify or maintain quality or safety of a service or device and to improve or enhance a service or device.	firms/trustees, as well as the owner/ investor of your loan.  • Federal and state governmental agencies as part of the loan process or their supervision of the company.
Characteristics of California or Federal Protected Classifications	<ul> <li>For our operational purposes or the operational purposes of our service provider or contractors</li> <li>As required by federal or state law</li> <li>To provide additional information about our customers when such information is voluntarily disclosed or provided</li> </ul>	
Internet or Other Similar Network Activity	<ul> <li>Providing analytics and advertising and marketing services.</li> <li>Undertaking activities to verify or maintain quality or safety of a service or device and to improve or enhance a service or device.</li> <li>Ensuring security and integrity as needed and as reasonably necessary and proportionate for this purpose.</li> </ul>	<ul> <li>Cloud storage providers</li> <li>Payment processors</li> <li>Web analytics providers</li> <li>Web hosting service providers</li> <li>E-mail distribution service providers</li> <li>Help Desk service providers</li> <li>Financial and accounting service providers</li> <li>Cybersecurity service providers</li> <li>Logistics and planning tool providers</li> <li>Customer relationship management tool providers</li> </ul>

Sensory or Surveillance Data	<ul> <li>For our operational purposes or the operational purposes of our service provider or contractors.</li> <li>Ensuring security and integrity as needed and as reasonably necessary and proportionate for this purpose.</li> <li>Undertaking activities to verify or maintain quality or safety of a service or device and to improve or enhance a service or device.</li> </ul>	<ul> <li>Help Desk service providers</li> <li>Customer relationship management tool providers</li> </ul>
Professional or Employment-Related Information	<ul> <li>For our operational purposes or the operational purposes of our service provider or contractors.</li> <li>Performing services on behalf of the business, including maintaining or servicing accounts, providing products or services, providing customer service, processing orders or transactions, verifying customer information, processing payments, providing financing, providing analytic services, storage, or other similar services.</li> </ul>	<ul> <li>Financial and accounting service providers</li> <li>Logistics and planning tool providers</li> <li>Customer relationship management tool providers</li> </ul>
Profile Data	<ul> <li>For our operational purposes or the operational purposes of our service provider or contractors.</li> <li>Providing analytics and advertising and marketing services.</li> </ul>	<ul> <li>Cloud storage providers</li> <li>Payment processors</li> <li>Web analytics providers</li> <li>Web hosting service providers</li> <li>E-mail distribution service providers</li> <li>Help Desk service providers</li> <li>Financial and accounting service providers</li> <li>Cybersecurity service providers</li> <li>Logistics and planning tool providers</li> </ul>

	<ul> <li>Customer relationship management tool providers</li> <li>Business partners used throughout the loan origination process and the servicing of your loan, for example: real estate appraisers, credit reporting agencies, title insurance companies, auditors, property preservation companies, foreclosure law firms/trustees, as well as the owner/ investor of your loan.</li> </ul>
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<u>In the preceding 12-month period, we did not collect or disclose:</u> commercial information, biometric information, geolocation, or education information (as defined in the Family Education Rights and Privacy Act).

## **Sensitive Personal Information**

Unless otherwise allowed by applicable state law, we will only collect certain types of sensitive personal information with your consent. We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under applicable state law, including California. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

The following categories have been collected and disclosed in the preceding 12 months	Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom this information was disclosed
Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul> <li>To perform services or provide goods you request and reasonably expect from us.</li> <li>To perform services for our business needs such as maintaining accounts, providing customer service, and fulfill orders.</li> <li>To collect or process sensitive personal</li> </ul>	<ul> <li>Cloud storage providers</li> <li>Customer relationship management tool providers</li> <li>Business partners used throughout the loan origination process and the servicing of your loan, for example: real estate appraisers, credit reporting agencies, title insurance companies, auditors, property</li> </ul>

Pacial or otheric avigin	information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided.	preservation companies, foreclosure law firms/trustees, as well as the owner/ investor of your loan.  Federal and state governmental agencies as part of the loan process or their supervision of the company.
Racial or ethnic origin, or religious or philosophical beliefs	<ul> <li>To perform services or provide goods you request and reasonably expect from us.</li> <li>To perform services for our business needs such as maintaining accounts, providing customer service, and fulfill orders.</li> </ul>	<ul> <li>Customer relationship management tool providers</li> <li>Federal and state governmental agencies as part of the loan process or their supervision of the company.</li> </ul>
Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul> <li>To perform services or provide goods you request and reasonably expect from us</li> <li>To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</li> </ul>	<ul> <li>Cloud storage providers</li> <li>Payment processors</li> <li>Help Desk service providers</li> <li>Financial and accounting service providers</li> <li>Cybersecurity service providers</li> <li>Logistics and planning tool providers</li> </ul>

<u>In the preceding 12-month period, we did not collect or disclose:</u> precise geolocation; contents of a consumer's mail, email, and text messages (unless we are the intended recipient of the communication); genetic data; biometric information for the purpose of unique identification; health information, information concerning sex life or sexual orientation.

The categories identified as collected in the tables above were collected from the following categories of sources:

- Information from you that you actively provide. We collect this information from sources such as from communications with us via online forms, e-mail, and telephone.
- Information from you that you passively provide from your use of our sites and services. We collect this information from sources such as web browsers, e-mails, apps, and smartphones.
- We may also collect this information from our observations and interactions with you.
- Information from third parties. We collect this information from the following sources such as:
  - Our affiliates
  - Fraud monitoring services
  - Licensing entities
  - Credit Reporting Agencies
  - Marketing partners
  - Advertising networks
  - Internet service providers
  - Data analytics providers
  - Government entities
  - Operating systems and platforms
  - Social networks
  - Data brokers

## What We Sell to Third Parties or Share with Third Parties for Cross-Context Behavioral Advertising

We may have sold or shared with third parties for cross-context behavioral advertising personal information to third parties in the preceding 12 months as disclosed in the table below. We do not sell or share sensitive personal information.

Categories sold to or shared with Non-Service Providers over the last 12 months	Categories of Non-Service Providers to whom this category of personal information has been sold or shared
Identifiers	Analytics providers
	Advertising partners
Internet or Other Similar Network	Analytics providers
Activity	Advertising partners
Geolocation Data	Analytics providers
	Advertising partners
Profile Data	Analytics providers
	Advertising partners

<u>We do not sell or share</u>: other personal information, including sensitive information, as described in the tables above.

#### Right to Opt-Out of Sale/Sharing

The purpose of the notice of Right to Opt-Out is to inform you that you have the right to direct us to stop selling or sharing your personal information, which is called the "Right to Opt-Out."

You may exercise your Right to Opt-Out by: (1) clicking "<u>Do Not Sell or Share My Personal Information</u>" to use our webform,(2) submitting a request by calling us toll-free at 866-317-2347,or (3) submitting your request through an opt-out preference signal (described further below in the section titled "Opt-Out Preference Signals").

Once you make an opt-out request, we will comply within 15 business days. We will wait at least twelve (12) months before asking you to reauthorize personal information sales or sharing. However, you may change your mind and opt back in to personal information sales or sharing at any time by using the our <a href="webform">webform</a> (https://shellpointmtg.com/consumer-privacy-act-request/). We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

### **Your Right to Know**

Certain states provide the right to request our disclosure of any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the business or commercial purpose for collecting, selling, or sharing with third parties for cross context behavioral advertising (e.g. targeted advertising)
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

#### **Your Right to Request Correction of Inaccurate Personal Information**

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information maintained by us. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used or maintained by us for the purpose of correcting your personal information and complying with our recordkeeping requirements.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under applicable law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

#### Your Right to Request Deletion of Your Personal Information

Certain states provide the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

## **Submitting a Verified Consumer Request**

You have the right to submit verified consumer requests to know information (and to receive your personal information in a portable format), to correct information, or for deletion.

You can submit a request through our <a href="webform">webform</a> (<a href="https://shellpointmtg.com/consumer-privacy-act-request/">https://shellpointmtg.com/consumer-privacy-act-request/</a>) or by calling us toll free at 866-317-2347. Your request will be verified using information you provide as described on the web form. If you call 866-317-2347 you will be asked to provide the same information requested on the web form for verification purposes. Your request will be verified by matching the information you provide to information that we have collected.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies.

The response to a request to know will provide all personal information collected and maintained about you in a portable format since January 1, 2022, unless an exception under applicable state law applies. Please note that depending on the applicable state law we may not be required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days, or as allowed under applicable law, describing our verification process. We will respond to your request within 45 calendar days, or as allowed under applicable law, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

#### Using an Authorized Agent to Submit a Request

<u>California</u>: Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a verifiable consumer request related to your personal information or a request to opt-out of sale or sharing. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity

directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

If you're an authorized agent making a request, you must submit a verified consumer request via the webform (https://shellpointmtg.com/consumer-privacy-act-request/) and:

- 1. Provide the power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or
- 2. Provide proof of signed permission along with a copy of your ID <u>and</u> have the consumer submit proof through our <u>webform</u> to directly confirm with us that they provided you permission to submit the request.

Other States: If you use an authorized agent, you may provide a power of attorney executed pursuant to applicable state law. If a power of attorney is not submitted, you may be required to provide commercially reasonable identification of your identity and evidence of your authorized agent's authority to act on your behalf. For example, you may need to provide the authorized agent signed permission to submit a request, verify your identity directly by submitting a verified consumer request according to the procedures in the section "Submitting a Verified Consumer Request," and directly confirm with us that you provided the authorized agent permission to submit the request.

#### Opt-Out Preference Signals/Universal Opt-Out Mechanism

Our use of tracking technologies may be considered a sale or share for targeted advertising under applicable state law. You can opt-out of being tracked by these third parties by clicking the "Do Not Sell of Share My Personal Information" link at the bottom of our website and selecting your preferences, or by broadcasting an Opt-Out Preference Signal/Universal Opt-Out Mechanism, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). Your request to opt-out of sale/sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us. Because the signal is browser-specific, you will need to broadcast subsequent signals if you are accessing our website through different online devices (e.g., computers, smartphones, tablets).

## Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by applicable law, 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.

## **Supplemental U.S. State Privacy Rights**

In addition to the privacy rights listed above, certain states provide supplemental privacy rights to residents of those states.

#### **Right to Opt-Out of Certain Profiling**

You have the right to opt-out of our use of profiling when used to make decisions that produce a legal or similarly significant effect concerning you or your interactions with us. Currently, we do not engage in such profiling.

#### Right to Appeal

You have the right to appeal our refusal to take action on, or respond to, a verified consumer request. Upon receipt of our denial or refusal to take action on, or to respond to, a verified consumer request, a consumer has 90 days to submit a request to appeal our decision by mail. We will timely inform you in writing of any action taken or not taken in response. We will also include a written explanation of the reasons for our decision.

## **Other California Privacy Rights**

California's "Shine the Light" law (Cal. Civil Code § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write us at:

Newrez LLC d/b/a Shellpoint Mortgage Servicing 75 Beattie Place #300 Greenville, South Carolina 29601 Attn: Compliance Department

#### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

#### **Contact for More Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information, 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: 888-673-5521

Website: https://ww.shellpointmtg.com

Postal Address: Newrez LLC d/b/a Shellpoint Mortgage Servicing

75 Beattie Place #300

Greenville, South Carolina 29601 Attn: Compliance Department