

## Notice of Collection and California Privacy Notice

**Effective Date:** January 1, 2020

**Last Updated on:** February 22, 2024

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### Introduction

This **Notice of Collection and California Privacy Notice** (“*California Notice*”) is for California Residents only. This California Notice supplements the information contained in our Privacy Policy <https://lo.highlandhomeloans.com/plvhighlandplano/legal/financial-privacy-policy.pdf>. It also explains how personal information is collected, used, shared, and disclosed, and describes rights provided by the California Privacy Rights Act of 2020 (“*CPRA*”) to individuals who reside in the State of California (“*consumers*” or “*you*”) regarding their [Personal Information](#), and explains how consumers can exercise those rights. We adopt this notice to comply with the CPRA and any terms defined in the CPRA have the same meaning when used in this Notice.

This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. Our privacy practices concerning our employees and contractors are addressed through internal policies and are outside the scope of this California Notice.

### Collection, Use and Sharing of Personal Information

Under the CPRA, “*Personal Information*” is information that identifies, relates to, describes, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. “Personal information” does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information. Also, the CPRA does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“*GLBA*”).

The specific Personal Information that we collect, use, and disclose relating to you will vary based on our relationship or interaction with you. For example, this Notice does not apply to information we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our Privacy Policy (<https://lo.highlandhomeloans.com/plvhighlandplano/legal/financial-privacy-policy.pdf>).

In the past 12 months, we have collected and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

| Categories of Personal | The Categories of Sources From | The Business or Commercial Purpose(s) for | The Categories of Third |
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| Information  | Which the Personal Information is Collected  | Which the Information is Collected, Used, and/or Shared  | Parties/Service Providers With Whom we Share Personal Information   |
|--|--|--|---|
| <p><b>Identifiers.</b> This may include 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.</p> | <ul style="list-style-type: none"> <li>• You</li> <li>• Internet Service Providers</li> <li>• Service Providers</li> <li>• Operating Systems and Platforms</li> <li>• Utility Companies</li> <li>• Web and Data Analytics Service Providers</li> <li>• Financial and Payment Technology Providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> <li>• Identity Verification Services</li> <li>• Asset Verification Services</li> <li>• Security and Fraud Detection Services</li> <li>• Government Entities</li> </ul> | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Account Services</li> <li>• Security and Fraud Detection</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Legal Obligations</li> <li>• Commercial/Economic Interests</li> <li>• Advertising and Marketing Services</li> <li>• Audits</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul> | <ul style="list-style-type: none"> <li>• Web and Data Analytics Service Providers</li> <li>• Financial and Payment Technology Providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> <li>• Identity Verification Services</li> <li>• Asset Verification Services</li> <li>• Security and Fraud Detection Services</li> <li>• Government Entities</li> <li>• Service Providers</li> </ul> |
| <p><b>Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).</b> This may include a name, signature, Social Security number,</p>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Internet Service Providers</li> <li>• Service Providers</li> <li>• Utility Companies</li> <li>• Financial and payment</li> </ul>   | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Account Services</li> <li>• Legal Obligations</li> <li>• Commercial/Economic Interests</li> </ul>   | <ul style="list-style-type: none"> <li>• Financial and payment technology providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> </ul>   |

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| 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.   | <ul style="list-style-type: none"> <li>technology providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> <li>• Government Entities</li> </ul>   | <ul style="list-style-type: none"> <li>• Security and Fraud Detection</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Advertising and Marketing Services</li> <li>• Audits</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul>   | <ul style="list-style-type: none"> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> <li>• Government Entities</li> <li>• Service Providers</li> </ul>  |
| <b>Characteristics of Protected Classification under California or Federal Law.</b> This may include age, 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). | <ul style="list-style-type: none"> <li>• You</li> <li>• Service Providers</li> <li>• Government Entities</li> <li>• Financial and Payment Technology Providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> </ul> | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Account Services</li> <li>• Legal Obligations</li> <li>• Commercial/Economic Interests</li> <li>• Security and Fraud Detection</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Advertising and Marketing Services</li> <li>• Audits</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul> | <ul style="list-style-type: none"> <li>• Financial and Payment Technology Providers</li> <li>• Consumer Reporting Agencies</li> <li>• Background Check Companies</li> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> <li>• Government Entities</li> <li>• Service Providers</li> </ul> |
| <b>Commercial information.</b> This may include records of personal property, products or services purchased, obtained, or considered, or  | <ul style="list-style-type: none"> <li>• You</li> <li>• Service providers</li> <li>• Financial and Payment Technology Providers</li> </ul>  | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Account Services</li> </ul>   | <ul style="list-style-type: none"> <li>• Service providers</li> <li>• Financial and Payment Technology Providers</li> </ul>  |

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| other purchasing or consuming histories or tendencies.  | <ul style="list-style-type: none"> <li>• Consumer Reporting Agencies</li> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> </ul>                  | <ul style="list-style-type: none"> <li>• Security and Fraud Detection</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Legal Obligations</li> <li>• Commercial/Economic Interests</li> <li>• Advertising and Marketing Services</li> <li>• Audits</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul> | <ul style="list-style-type: none"> <li>• Consumer Reporting Agencies</li> <li>• Identity Verification Services</li> <li>• Security and Fraud Detection</li> <li>• Asset Verification Services</li> </ul>   |
| <b>Biometric information.</b> This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity, including deoxyribonucleic acid (DNA), fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | We do not collect, use, or share biometric information.   | None.  | None.  |
| <b>Internet or other similar network activity.</b> This may include browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.   | <ul style="list-style-type: none"> <li>• You</li> <li>• Internet Service Providers</li> <li>• Service Providers</li> <li>• Operating Systems and Platforms</li> <li>• Web and Data Analytics Service Providers</li> </ul> | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Security and Fraud Detection</li> <li>• Advertising and Marketing Services</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Legal Obligations</li> </ul>      | <ul style="list-style-type: none"> <li>• Internet Service Providers</li> <li>• Service Providers</li> <li>• Operating Systems and Platforms</li> <li>• Web and Data Analytics Service Providers</li> </ul> |

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|   |   | <ul style="list-style-type: none"> <li>• Commercial/Economic Interests</li> <li>• Account Services</li> <li>• Audits</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul>  |   |
| <b>Geolocation data.</b> This may include physical location or movements.   | <ul style="list-style-type: none"> <li>• You</li> <li>• Internet Service Providers</li> <li>• Service Providers</li> <li>• Operating Systems and Platforms</li> </ul> | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Security and Fraud Detection</li> <li>• Commercial/Economic Interests</li> <li>• Account Services</li> <li>• Audits</li> <li>• Advertising and Marketing Services</li> <li>• Debugging</li> <li>• Improvement of Products and Services</li> <li>• Internal Research</li> <li>• Legal Obligations</li> <li>• Mergers, Acquisition or Bankruptcy</li> </ul> | <ul style="list-style-type: none"> <li>• Service Providers</li> </ul> |
| <b>Sensory data.</b> This may include audio, electronic, visual, thermal, olfactory, or similar information.  | We do not collect, use, or share Sensory data.  | None.  | None.   |
| <b>Professional or employment-related information.</b> This may include current or past job history or performance evaluations.   | <ul style="list-style-type: none"> <li>• You</li> <li>• Service providers</li> </ul>  | <ul style="list-style-type: none"> <li>• Our corporate parent company Hilltop Holdings, Inc., and its affiliates and subsidiaries</li> <li>• Account Services</li> <li>• Legal Obligations</li> <li>• Commercial/Economic Interests</li> <li>• Background Checks</li> <li>• Audits</li> </ul>  | <ul style="list-style-type: none"> <li>• Service Providers</li> </ul> |
| <b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).</b> This may include education records directly | We do not collect, use, or share Non-public education information.  | None.  | None.   |

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| related to a student maintained by an educational institution or party acting on its behalf, such as report cards, transcripts, class lists, student schedules, student identification codes, student financial information, and student disciplinary records.   |  |       |      |
| <b>Inferences drawn from other personal information.</b> This may include information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes. | We do not collect, use, or share inferences. | None. | None |

We may use or disclose the Personal Information we collect for the following purposes, as further detailed above.

1. To perform the services or provide the goods reasonably expected by you if you request those goods or services from us.
2. To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information, provided that the use of your Personal Information is reasonably necessary and proportionate for this purpose.
3. To resist malicious, deceptive, fraudulent, or illegal actions directed at us and our parent company, and its affiliates and subsidiaries and to prosecute those responsible for those actions, provided that the use of your Personal Information is reasonably necessary and proportionate for this purpose.
4. To ensure the physical safety of natural persons, provided that the use of your Personal Information is reasonably necessary and proportionate for this purpose.

5. For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with us, provided that the Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside of your current interaction with us.
6. To perform services on our behalf, provided that the use of your Personal Information is reasonably necessary and proportionate for this purpose.
7. To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us, provided that the use of your Personal information is reasonably necessary and proportionate for this purpose.
8. For purposes that infer characteristics about you (except that we do not use Sensitive Personal Information for this purpose).

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.

#### Disclosing Your Personal Information for a Business or Commercial Purpose

We may disclose your personal information to third parties to carry out specific business or commercial purposes. In the preceding 12 months, we have disclosed consumer personal information for business or commercial purposes to our service providers and the following categories of third parties:

- Web and data analytics service providers.
- Operating systems and platforms.
- Financial and payment technology providers.
- Consumer reporting agencies.
- Background check companies.
- Identity verification services.
- Asset verification services.
- Security and fraud detection.
- Government entities.

In the last 12 months, we have disclosed the following categories of personal information (as described in more detail above) for a business or commercial purpose:

- Identifiers.
- Personal information described in the California Customer Records Statute (see description above).
- Characteristics of Protected Classification under California or Federal Law.
- Internet or other similar network activity.
- Commercial information.
- Geolocation data.
- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))
- Professional or Employment Related Information

## No Sales of Personal Information

We have not sold consumer Personal Information to third parties for a business or commercial purpose in the preceding 12 months. We do not and will not sell your Personal Information. In addition, we do not sell the Personal Information of minors under 16 years of age.

## Your Rights

If you are a California resident, you have the following rights:

1. **Right to Know:** You have the right to request that we disclose to you free of charge the following information covering the 12 months preceding your request:
  - a. the categories of Personal Information about you that we collected;
  - b. the categories of sources from which the Personal Information was collected;
  - c. the purpose for collecting Personal Information about you;
  - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - e. the specific pieces of Personal Information we collected about you if disclosure does not create a substantial, articulable, and unreasonable risk to the security of that personal information, your account with us, or the security of our systems or networks;
2. **Right to Request the Deletion of Your Personal Information:** You have the right to request that we delete any Personal Information we collected from you or maintained on you. Once we receive and confirm your verifiable consumer request, if we determine that we must comply with a deletion request and delete your Personal Information from our records, we will also direct any service providers we work with to also delete your Personal Information from their records. A household may request the deletion of aggregate household personal information by submitting a verifiable consumer request. If all consumers in a household jointly request the deletion of household personal information, and we can individually verify all the members of the household, then we will comply with the request. Please note that we may deny your deletion request for a number of different reasons, which are identified in the CPRA; and
3. **Non-Discrimination:** You have the right to be free from unlawful discrimination for exercising your rights under the CPRA. We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, 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 with 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.

## *How to Exercise Your Rights*

If you are a California resident, you may exercise your Right to Know or your Right to Request the Deletion of your Personal Information by:

1. Completing this [Personal Information Request Form](#)
2. Calling us at 1-800-294-1499

Only you (or an authorized agent) may make a verifiable consumer request for your Personal Information or deletion of your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.



## How We Verify Your Request

We will verify you as follows:

- If you submit a request to know the categories of personal information, you will need to provide us with your name and address along with one other additional identifier, which we will attempt to match with your name and address and that one other additional identifier in our system to verify your identity.
- If you submit a request to know specific pieces of personal information, you will need to provide us with your name, address, and two additional identifiers, which we will attempt to match with your name, address, and two additional identifiers in our system to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose personal information is the subject of the request.
- If you submit a request to delete your personal information, you will need to provide us with your name and address along with one other additional identifier, which we will attempt to match with your name and address and that one other additional identifier in our system to verify your identity. In certain instances, you also may be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose personal information is the subject of the request.

## Authorized Agents for Requests

You may designate an authorized agent to make a request on your behalf. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request, you must provide the authorized agent with written permission to do so and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

### ***Response Timing and Format***

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

Depending on the circumstances, we may not be able to honor your request. For example, we will only be able to honor your request if we can verify your identity and verify that you have the authority to make a request on behalf of another individual. Additionally, we will not be able to honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CPRA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CPRA. If we need an extension for up to an additional 45 days to process your request, we will provide you with an explanation for the delay. For requests to know, any personal information we provide will cover the 12-month period preceding our receipt of your verifiable consumer request. If we are unable to comply with a given request, we will provide you with a response explaining why we have not taken action on your request and identifying any rights you may have to appeal the decision.

We will not charge you 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.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

#### Retention

Typically, we retain your Personal Information for the period necessary to fulfill the purposes outlined in this California Notice unless a longer retention period is required or permitted by law. Please note that in many situations, we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

#### Accessibility

We are committed to ensuring this California Notice is accessible to individuals with disabilities. If you wish to access this California Notice in an alternative format, please get in touch with us as described in the [Contact Us](#) section below.

#### Changes to Our California Notice

We are required by law to update this California Notice at least once each year. This California Notice was last updated on February 22, 2024. We may change or update this California Notice from time to time. When we do, we will post the revised Disclosure on this page with a new “Last Updated” date.

#### Contact Information

If you have any questions or comments about this notice, how we collect and use your information described here, 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:** 1-800-294-1499

**Website:** [www.primelending.com/ccpa](http://www.primelending.com/ccpa)

**Email:** [ConsumerFeedback@primelending.com](mailto:ConsumerFeedback@primelending.com)

**Postal Address:**

Highland HomeLoans, LLC

C/O Compliance, Consumer Relations Officer

18111 Preston Road, Suite 900

Dallas, TX 75252