

FACTS

WHAT DOES LOAN MONKEY, INC.
DO WITH YOUR PERSONAL INFORMATION?

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| Why? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | <div>The types of personal information we collect and share depend on the product or service you have with us. This information can include:<ul style="list-style-type: none">Social Security numberCredit history and account balanceAssets and payment history</div> |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Loan Monkey, Inc. chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Loan Monkey, Inc. share? | Can you limit this sharing? |
|--|-------------------------------|-----------------------------|
| For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes—to offer our products and services to you | Yes | No |
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes—information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes—information about your creditworthiness | Yes | Yes |
| For our affiliates to market to you | Yes | Yes |
| For nonaffiliates to market to you | No | We don't share |

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|----------------------|---|
| To limit our sharing | <div><ul style="list-style-type: none">Visit us online at www.LoanMonkey.comCall (800) 962-6414Mail the form belowEmail us: accounting@loanmonkey.com<p>Please note:</p><p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p><p>However, you can contact us at any time to limit our sharing.</p></div> |
| Questions? | Go to www.LoanMonkey.com |

Mail-in Form

| | | |
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| | Mark any/all you want to limit: | |
| | <input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. | |
| | <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. | |
| | Name | |
| | Address | |
| | City, State, Zip | |
| Mail To: | Loan Monkey, Inc. Attn: Privacy Opt Out 1450 Frazee Road Suite 602 San Diego, California 92108 | |

| Who we are | |
|--|---|
| Who is providing this notice? | Loan Monkey, Inc. |
| What we do | |
| How does Loan Monkey, Inc. protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
| How does Loan Monkey, Inc. collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none">■ apply for a loan or give us your income information■ provide account information or give us your employment history■ give us your contact information <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none">■ sharing for affiliates' everyday business purposes-information about your creditworthiness■ affiliates from using your information to market to you■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account - unless you tell us otherwise. |
| Definitions | |
| Affiliates | <p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none">■ <i>Our affiliates include financial companies such as Orchard Title and nonfinancial companies such as Orchard Brokerage.</i> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none">■ <i>Loan Monkey, Inc. does not share with nonaffiliates so they can market to you</i> |
| Joint marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none">■ <i>Loan Monkey, Inc. doesn't jointly market with non-affiliated companies.</i> |
| Other important information | |
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Online Privacy Policy

Your privacy is extremely important to us. Protection of your personal or sensitive information and use of such data in a fair and trustworthy fashion comes with a degree of trust in manner that is key to the core values of Loan Monkey, Inc. This policy applies to all information collected by or in use of Loan Monkey, Inc.

Loan Monkey, Inc. understands that consumers furnish sensitive information during the mortgage application process as is considering to be within the course of business. The Company and Management are committed to treating such information responsibly and identify expectations surrounding the sourcing, storage, and retention of such personal and financial information.

Loan Monkey, Inc. is dedicated to take all the necessary steps to safeguard sensitive information that has been entrusted to us and lenders by their customers. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use this online service.

As you review this Online Privacy Policy, here are a few general principles to keep in mind:

- Our online services are intended for a U.S. audience. If you visit or use our online services, your information may be transferred or processed in the United States.
- Our online services are not intended for children under 13. We do not knowingly collect personal information from children under 13 without parental consent
- If you are a California resident, you may have rights under the California Consumer Privacy Act.

Gramm Leach Bliley Act

Subtitle A of Title V of the Gramm Leach Bliley Act established specific guidelines regarding to disclose nonpublic personal information about a consumer to nonaffiliated third parties and requires a financial institution to disclose to all of its customers the institution's privacy policies and practices relating to information sharing with both affiliates and nonaffiliated third parties. Additionally, the Act requires that customers be provided an opportunity to opt-out of sharing his or her nonpublic personal information to nonaffiliated third parties subject to certain exceptions. Loan Monkey, Inc. has elected to not share any non-public personal information with nonaffiliated third parties other than as permitted by the exceptions delineated in the privacy rule.

Definitions

Affiliate- any company that controls, is controlled by, or is under common control.

Personally, identifiable financial information - any information collected about a consumer in connection with providing a financial product or service to that consumer. This includes: information provided by the consumer during the application process (e.g., name, phone number, address, income); information resulting from the financial product or service transaction (e.g., payment history, loan or deposit balances, credit card purchases); information from other sources about the consumer obtained in connection with providing the financial product or service (e.g., information from a consumer reporting agency or from court records)

Publicly available information - any information Loan Monkey, Inc. reasonably believes is lawfully made available to the general public from federal, state, or local government records, widely distributed media, or disclosures to the general public that are required to be made by federal, state, or local law.

Nonaffiliated third party – means any person who is not an affiliate.

Nonpublic personal information - consists of personally identifiable financial information obtained or that is provided by a consumer that is not publicly available information. It includes any lists, descriptions, or other groupings of consumers (including publicly available information contained therein) that are derived using personally identifiable financial information that is not publicly available.

Recipient – receipt of nonpublic personal information from a nonaffiliated financial institution and to any nonaffiliated entity to which Loan Monkey, Inc. gives nonpublic personal information.

Right to Financial Privacy Act

The Right to Financial Privacy Act established guidelines and procedures regarding how agencies of the federal government may obtain the financial records of certain customers. The Right to Financial Privacy Act covers requests for financial information regarding individuals and partnerships with five or fewer people. It does not govern record requests for corporations or partnerships with more than five people. The Right to Financial Privacy Act only covers requests from a federal government authority. It does not apply to requests from the Internal Revenue Service or from state, local, or other non-federal agencies.

Loan Monkey, Inc. will not honor any request for information that does not comply with the requirements of the Right to Financial Privacy Act. Strict precautions will be taken to prevent the release of inappropriate information as allowed by the Right to Financial Privacy Act.

Information Collected

Personal Information

Information related to any identified or identifiable individual person or party, such as employees, customers, contractors, partners or any other third party (including third parties' personnel). Examples of Personal Information are name, address, or credit card number. Other examples of Personal Information may include browsing history, loan applications, and requests for information about products and services, if they relate to an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his identity. from many sources is collected.

Because of the nature of information collected from the consumer through the website we recognize that there is a risk of the consumer's information being stolen. In order to protect against identity theft all of the data that customers provide will be transmitted securely to our server where we implement industry standard best practices in securing consumer data, such as using 256-bit encryption. The system that we will be using is from BeSmartee and is SOC2 Type II audited. The provider maintains a SOC2 Type II Compliance posture, which includes management of software updates. BeSmartee implements security software patch updates on their platform as quickly as

possible after notification of availability is received. SOC2 Type II Compliance ensures their systems are maintained at appropriate patch/system version levels through timely application of system updates.

Sensitive Personal Information

Is Personal Information that receives special legal protection under applicable law. Some examples in the US include social security numbers, credit card numbers, personal health information, credit reports and ratings, race, political affiliations, religious beliefs, personal health information, etc. Sensitive information may require heightened security protection or special individual consent.

Usage and Other Information

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. We or our third-party partners may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

Use of Information

We use the information discussed above in a number of ways, such as:

- Processing applications and transactions;
- Verifying your identity (such as when you access your account information);
- Preventing fraud and enhancing the security of your account or our online services;
- Responding to your requests and communicating with you;
- Performing analytics concerning your use of our online services, including your responses to our emails and the pages you view;
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations, and our policies; and
- For any other purposes that we may specifically disclose at the time you provide, or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Information Disclosed

We do not disclose nonpublic personal information except as permitted or required by law. Disclosure of personally identifiable information without consumer's refusal occurs in the following circumstances;

- To certain nonaffiliated third parties (under limited circumstances) to the extent permissible under law to service the lenders customer, report to credit bureaus, manage risk, and perform other financial services related activities.
- Disclosing information, we receive on a lenders customer loan application such as the assets, liabilities, income, and employment history for a lender using our system to determine whether a loan made to the customer is salable in the secondary market, for example.
- Information necessary to enforce legal or contractual rights, if applicable, or the right of any other person who is engaged in a transaction directly with our company and not the lender.
- To disclose information required in the ordinary course of business, such as in the settlement of claims or benefits or the confirmation of information to a lender's customer or the consumer's agent.
- To provide information to agencies, persons that are assessing our compliance with industry standards, and our attorneys, accountants, and auditors.
- To the extent permissible under the Right to Financial Privacy Act.
- To comply with federal, state, or local laws, rules, and other applicable legal requirements.

Understanding Cookies, Web Beacons and Other Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

- "Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies but doing so may degrade your experience with our online services.
- Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

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- Local Shared Objects, sometimes referred to as “flash cookies” may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation but may not be managed in your browser in the same way. For more information on managing Local Shared Objects.

Safeguarding

We protect consumer privacy by ensuring that only employees who have a business reason for knowing information have access to it. We have retained the services of a compliance officer as the financial privacy coordinator, who is consulted for maintaining internal procedures to ensure that our consumers’ information is protected.

All employees have a copy of this policy and are trained at least annually regarding the importance of safeguarding information. Any employee who violates our privacy policy is subject to disciplinary action.

Additional Info. Collecting, Accessing, and Sharing PII

Collecting or maintaining any sensitive PII electronically in our database, accessible remotely from AWS servers, adheres to best practices related to privacy impact assessments. Access to sensitive PII is based on having a “need to know” basis for the collection of the info., i.e., when the info. relates to our official duties of delivering software services to lenders licensing our platform to enable their customers to have the ability to submit loan applications and corresponding documentation. Access is limited to only sensitive PII needed to fulfill our services, and not to view or use sensitive PII for any purpose other than to fulfill this our required duties.

No documents and data are accessible to casual visitors, passersby, or other individuals within the office without a “need to know.” There will never be an authorization to access, share, or display any info. deemed sensitive PII outside work hours or outside of corporate headquarters, and outside of the company administrative login site. In addition, unless specifically designated to conduct work related to the development and delivery of the platform services to our client, you will not have the ability to access sensitive PII unless given the specific authority and access to do so by a direct supervisor. Your access will be monitored utilizing an audit trail of your login, and pages accessed while you are logged in.

Linking to Third-Party Websites

Loan Monkey, Inc. may provide links to websites that are owned or operated by other companies (“third-party websites”). When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Updating Your Information

Keeping your account information up to date is very important. You may review or update certain account information by logging in and accessing the “Customer Center” section. If you cannot change the incorrect information online, or you prefer to request changes offline, please use the Contact Us option on our site, or call or

write to us using the contact information listed on your account statements, records, or other account materials. You can also speak to one of our branch representatives, your financial advisor, or your designated account representative.

Changes to this Online Privacy Policy

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise.