

California Privacy Rights Act Notice

FOR CALIFORNIA RESIDENTS ONLY

Notice Statement

This Privacy Notice is made available pursuant to the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act of 2023 (CPRA).

Please review this notice carefully as it applies to the personal information, we collect about you solely in your capacity as a Towne Mortgage Company (“Towne”) applicant, job candidate, employee, or former employee (“employee” or “former employee” are sometimes hereinafter referred to as “Team Member”).

Under the CCPA, personal information includes information that identifies and describes who you are, as well as information that relates to or is capable of being associated with, or could reasonably be linked to you, one of your devices, and/or a member of your household.

Respecting the privacy of our Team Members and third parties is an essential part of our privacy rights program. We are committed to the proper handling of the Personal Information and Sensitive Personal Information collected or processed in connection with your relationship with the company. This notice describes categories of Personal Information and Sensitive Personal Information that the company collects and the purposes for which we process that information in accordance with CCPA and CPRA.

“Personal Information” (“PI”) means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. PI includes Sensitive Personal Information, but does not include protected health information covered by the Health Information Portability and Accountability Act (“HIPAA”), nonpublic personal information under the Gramm-Leach-Bliley Act (“GLBA”), or any other information which is exempt from the CCPA.

“Sensitive Personal Information” (“SPI”) means PI that reveals, among other things, social security number, driver’s license number, state identification card number, passport number, racial or ethnic origin, union membership, or the contents of a Consumer’s mail, email, and text messages, unless Towne is the intended recipient of the communication.

Exercising Your Rights

If you are a California resident, applicant, Team Member or former Team Member, you may exercise any of your rights under the CCPA or CPRA. The Company will not discriminate against you for exercising such rights, including but not limited to:

- You have the right to access PI which we may collect or retain.
- You have the right to limit how your SPI is disclosed or shared with third parties.
- You have the right to request the deletion of your PI.
- You have the right to request correction of any inaccurate PI.

I. Personal Information We Collect

| Stages | Personal Information |
|--------------------------------------|---|
| Applicant | <p>What we Collect - Identifiers such as: name, contact information, address, education, internet address and employment history.</p> <p>How it is Used - Evaluation process for candidates for employment.</p> |
| Post Offer | <p>What we Collect - SPI such as: driver license, social security numbers, and/or other government issued ID numbers confirming citizenship/immigration status. Characteristics of protected classifications such as date of birth, race, national origin, and gender.</p> <p>How it is Used – Validating right to work, obtaining/verifying of background checks, tracking of time and attendance, and processing payroll.</p> |
| New Hire | <p>What we Collect - Bank account information and biometric finger scan.</p> <p>How it is Used – Allows the Company to administer payroll electronically per Team Member request.</p> |
| Active Team Member | <p>What we Collect – Worker compensation and compliance and leave of absence requests that require medical information regarding Team Members’ respective medical situation. Geo-location data and sensory data. The name of your school, course information, major, their final grade, receipt of tuition payment, and any financial aid received.</p> <p>How it is Used – To provide a service or support to the Team Member by request only. Geo-location data is used to track laptops and sensory data is used in connection with the recording of telephone calls. The schooling information is collected in furtherance of Towne’s Educational Assistance Program.</p> |
| Benefit Eligible Team Members | <p>What we Collect – When required, dependent information to include the date of birth and gender for benefit enrollment and administration.</p> |

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| | <p>How it is Used – To administer and maintain benefits including: group health insurance, retirement, and other related benefit programs.</p> |
| <p>Third Parties</p> | <p>What we Collect – If you request entry upon Company property, you may be subject to security video recording and review of government-issued identification.</p> <p>How it is Used – Any collected materials are used exclusively to ensure the safety and security of Company property and Team Members. To the extent there is a security incident, such materials will be reviewed and may be shared with law enforcement officials or other appropriate authorities.</p> |

II. How Personal Information Is Collected

We collect most PI directly from you; however, we may also collect PI from the following:

- Publicly accessible sources;
- Directly from a third party for background checks;
- A third party, such as a bank, financial institution, or advisor (with your consent);
- Consultants and other professionals we may engage in relation to your matter (with your consent);
- Our Information Technology systems, including:
 - Online case management, document management, and time recording systems;
 - Door entry systems and reception logs
- Security cameras

III. Other Purposes for Which Personal Information Is Collected

The purposes for which the company will collect or use your PI include:

- To comply with state and federal law and regulations.
- To maintain commercial insurance policies and coverages, including worker's compensation and other liability insurances.
- To aggregate data to perform workforce analytics, data analytics, and benchmarking.
- To conduct our business operations and administration in connection with matters as your employer or potential employer.
- To comply with our internal business processes and policies.
- To prevent unauthorized access and modifications to our systems.

IV. Disclosure Of Personal Information

The Company shall use a reasonable standard of care to store and protect from disclosure any PI or SPI collected using the principles of least-privileged access and by limiting access to PI and SPI to only those individuals with a 'need to know'. The Company utilizes appropriate physical, technical, and organizational security measures and procedures to store and to protect PI and SPI from unauthorized use, loss, alteration, destruction, or modification.

The Company shall retain your PI and SPI until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your PI or SPI may be retained further for that reason. Lastly, the Company may be obligated to share PI or SPI in the event the Company is subject to a request for disclosure associated with any applicable legal or regulatory obligation.

V. Changing Team Member Details and Contact Information

We want to maintain the most up-to-date information. Personal information can be changed in our HR/payroll records by request for any applicant or former Team Member. This information can also be updated by the Team Member through the ADP Team Member access portal, or alternatively by contacting the Human Resources department HR@Townemortgage.com. Should you have any further inquiries or comments on the uses of PI or SPI, please speak to a representative in the Human Resources Department at 248-247-1818 or via e-mail at HR@Townemortgage.com.

VI. Modifications and Revisions

We reserve the right to modify, revise, or otherwise amend this Privacy Notice at any time and in any manner. Any new version of this Notice will be posted on the careers.townemortgage.com website. This Notice will be reviewed annually and updated, as necessary.

Revision Date: April, 2024