

Notice to California Residents - Your California Privacy Rights:

This **Privacy Notice for California Residents** supplements the information contained in Innovate Loan Servicing Corporation’s (“**Innovate**” or “**we**”) Privacy Policy and applies solely to residents in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 and its regulations as amended from time to time (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We may collect information, including certain Sensitive Personal Information identified below, that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**Personal Information**”). In particular, Innovate may have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category of Personal Information	Examples	Collect
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, 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. Some Personal Information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), 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).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

In addition to the Personal Information identified in Category A and B above, Innovate may have collected, within the last twelve (12) months, certain Sensitive Personal Information from consumers such as (i) A consumer's social security, driver's license, state identification card, or passport number; (ii) A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; or (iii) the contents of a consumer's mail, email, and text messages.

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Innovate does not collect Sensitive Personal Information from consumers such as (i) A consumer's precise geolocation; (ii) A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; (iii) A consumer's genetic data; (iv) The processing of biometric information for the purpose of uniquely identifying a consumer; (v) Personal information collected and analyzed concerning a consumer's health or (vi) Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

Innovate does not collect any Sensitive Personal Information for any purpose outside of the purpose for which it was shared with us.

Sources of Personal Information We Collect

Innovate obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, when you provide your personal information to us in connections with our servicing your account.
- From third-parties. For example, we may receive Personal Information about you from third parties when we purchase or service loans for others. We, our service providers, and other third parties with whom we do business may collect information about you from commercially available resources.

Use of Personal Information

We may use, or disclose the Personal Information we collect for one or more of the following business or commercial purposes:

- To service and communicate with you about your account.
- Carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collections.
- To resolve disputes, respond to your requests, process payments and prevent transactional fraud.
- To help maintain the safety, security, and integrity of your account and our website.
- To comply with regulatory or legal processes and as required by applicable law, court order, or governmental regulations.
- To perform services on behalf of Innovate, third parties or service providers, including maintaining or servicing accounts, providing customer service, verifying customer information, processing payments.

Innovate does not collect the Personal Information of minors under 16 years of age and does not disclose, share or sell the Personal Information of minors under 16 years of age.

Innovate does not use any Sensitive Personal Information for any purpose outside of the purpose for which it was shared with us.

Sharing Personal Information

Innovate may disclose your Personal Information to a third party for a business or commercial purpose. We share your Personal Information with the following categories of third parties:

- Our affiliates.
- Service providers.
- Government regulators.
- Parties involved in a legal process.
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the services we provide to you.

Innovate does not share your Personal Information with third parties for third-party direct marketing purposes without your consent.

Innovate does not collect the Personal Information of minors under 16 years of age and does not disclose, share or sell the Personal Information of minors under 16 years of age.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business or commercial purpose:

- Category A: Identifiers
- Category B: California Customer Records Personal Information categories

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Service providers
- Investors
- Purchasers of accounts

Sales of Personal Information

In the preceding twelve (12) months, we have sold your Personal Information to the following third parties:

- Innovate has not sold your Personal Information

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know About Personal Information Collected, Disclosed, Shared or Sold and Deletion Rights

You have the right to request that Innovate disclose certain information to you about our collection, use and disclosure of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *How to Exercise Your Right to Know About Personal Information Collected, Disclosed, Shared or Sold and Deletion Rights or Right to Request Correction of inaccurate of Personal Information*), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Innovate does not sell your Personal Information. Innovate does not share your Personal Information with third parties for third-party direct marketing purposes without your consent.

Right to Request Correction of inaccurate of Personal Information

You have the right to request that Innovate correct any inaccurate Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *How to Exercise Your Right to Know About Personal Information Collected, Disclosed, Shared, Sold and Deletion Rights or Right to Request Correction of inaccurate of Personal Information*), we will review and consider any documentation or information that you provide in connection with your right to correct, provided you make a good-faith effort to provide us with all relevant information at the time of request.

Right to Request Deletion of Personal Information

You have the right to request that Innovate delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *How to Exercise Your Right to Know About Personal Information Collected, Disclosed, Sold and Deletion Rights or Right to Request Correction of inaccurate of Personal Information*), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

In the event that we are unable to honor a request, we will inform you of the reasons behind the decision.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

How to Exercise Your Right to Know About Personal Information Collected, Disclosed, Shared or Sold and Deletion Rights or Right to Request Correction of inaccurate of Personal Information

To exercise your *Right to Know About Personal Information Collected, Disclosed, Shared or Sold, and Deletion Rights or Right to Request Correction of inaccurate of Personal Information* described above, please submit a verifiable consumer request to us by either:

- Calling us at: 1-888-904-4777
- Online at: customer.service@innovateauto.com

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Use of An Authorized Agent

You have the right to use an authorized agent to act on your behalf to exercise your privacy rights under the CCPA.

You must provide us with either:

- (i) a copy of a properly executed power of attorney authorizing the individual named in the power of attorney to act on your behalf to exercise your rights under the CCPA, or
- (ii) a notarized letter signed by you and authorize the individual named in the letter to act on your behalf to exercise your rights under the CCPA.

Response Timing and Format

We will confirm receipt of a verifiable consumer request within ten (10) business days of its receipt of the request. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee 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.

Right to Opt-Out of the Sale/Sharing of Personal Information

Innovate does not collect, share or sell the Personal Information of minors under 16 years of age.

You have the right to tell us not to sell your Personal Information (Opt-Out) and submit a request to Opt-Out of the sale of your Personal Information. You may later choose to permit us to sell your Personal Information.

If you do not wish for us to sell your Personal Information to third parties (if we sell your Personal Information), click on the "[Do Not Sell My Personal Information](#)" link provided. After opting out, we may continue to share some Personal Information with our partners (who will function as our service providers in such instance) to help us in connection with servicing your account.

Do Not Sell My Personal Information

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

You have a right to Not receive discriminatory treatment for exercising your CCPA rights. We respect your rights and we will not discriminate against you in violation of the CCPA for exercising any of your CCPA rights.

Notice of Financial Incentive

We do not offer any financial incentive, benefit, or price differences in return for the disclosure, deletion, or sale of Personal Information.

Changes to Our Privacy Notice

Innovate reserves 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 our 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 Innovate For More Information

If you have any questions or comments about this notice, Innovate's privacy policies and practices, your choices and rights under the CCPA or wish to exercise your rights under the CCPA, please do not hesitate to contact us at:

- Calling us at: 1-888-904-4777
- Online at: customer.service@innovateauto.com

Innovate Privacy Policy

You can access Innovate's Privacy Policy: ils.theinnovatecompanies.com/privacypolicy/.