

NATIONS DIRECT MORTGAGE, LLC CALIFORNIA HR PRIVACY NOTICE

Privacy Information for California Employees and Applicants

We collect Personal Information from current and past employees ('Employees') and Applicants and comply with the California Consumer Privacy Act and related laws and regulations ("California privacy laws"). This California HR Privacy Notice applies to California Employees and Applicants ("you" or "your").

"Personal Information" means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Information:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of California privacy laws.

This Privacy Notice provides the following information to California Employees and Applicants:

- Categories of Personal Information we collect;
- Purposes for which we use Personal Information;
- Categories of Personal Information we disclose to third parties;
- Categories of third parties to which we disclose Personal Information; and
- How Employees and Applicants can exercise their rights under California privacy laws:
 - The rights to access, correct, or delete Personal Information;
 - The right to limit the use of sensitive Personal Information in certain circumstances; and
 - The rights to opt out of targeted advertising, sales of Personal Information, or profiling.

Categories of Non-Sensitive Personal Information

The table below outlines the non-sensitive categories of Personal Information Nations Direct Mortgage, LLC collects about Employees and Applicants and whether and how they are disclosed to third parties.

We collect Non-Sensitive Personal Information from the following sources:

- Directly from our Employees and Applicants

Category of Personal Information: Professional Information
Examples
Professional Information may contain the following: Employment History
Purpose(s) for Collection
To determine qualifications and aid in hiring decisions.
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.
Category of Personal Information: Identifiers
Examples
Identifiers may contain the following: Name, Physical Address, Personal Email Address
Purpose(s) for Collection
Background Check, employee mailings, employment and benefits eligibility

Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.
Category of Personal Information: Personal Characteristics
Examples
Personal Characteristics may contain the following: Age, Gender
Purpose(s) for Collection
Benefits, Federal EEOC purposes
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties

Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.
Category of Personal Information: Educational Information
Examples
Educational Information may contain the following: Degrees earned or Secondary Education Information
Purpose(s) for Collection
Employment eligibility
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties

Retention Period
Retained for at least 7 years.

Categories of Sensitive Personal Information

The table below outlines the categories of Sensitive Personal Information Nations Direct Mortgage, LLC collects about Employees and Applicants and whether they are disclosed to third parties. We collect Sensitive Personal Information from the following sources:

- Directly from our Employees and Applicants
- From our business partners (“business partners” are companies that we have a pre-existing commercial relationship with)

Category of Sensitive Personal Information: Government ID Information
Examples
Government ID Information may contain the following: Drivers License, Social Security Card, and any documentation verifying eligibility to work in the United States.
Purpose(s) for Collection
Confirming identity, work authorization
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties

Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
According to the U.S. Citizenship and Immigration Services requirements for I-9 documents.
Category of Sensitive Personal Information: Financial Information
Examples
Financial Information may contain the following: Bank Name, Routing Number, and Account Number.
Purpose(s) for Collection
Payroll direct deposit capabilities.
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.

Category of Sensitive Personal Information: Communication Data
Examples
Communication Data may contain the following: Personal email, Cell Phone Number, Home Phone Number
Purpose(s) for Collection
Sign employment agreements, general and emergency communications
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.
Category of Sensitive Personal Information: Sensitive Category Information
Examples
Sensitive Category Information may contain the following: Gender, Race, Ethnicity, Veteran and/or Disability Status, Citizenship or Immigration Status

Purpose(s) for Collection
Per the requirements of the Federal Equal Employment Opportunity Commission.
Targeted Advertising
We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale
This information is not sold to third parties
Other Disclosures
This information is not otherwise disclosed to third parties
Retention Period
Retained for at least 7 years.

Use of Personal Information

We use Personal Information for the purposes described above. Other examples of how we may use your Personal Information within Nations Direct Mortgage, LLC include:

- Publishing Employees’ work contact information in an intra-company directory for other Employees to view.
- Disclosing applicants’ submitted Personal Information with our HR department and other employees to process applications.

Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

Disclosing Personal Information

We disclose Personal Information to the following categories of third parties:

- Processors (also referred to as “Service Providers” or “Contractors” in California law): We use processors to securely handle Personal Information on our behalf for our business purposes and only on our instructions. California privacy laws and our contracts with these companies prevent them from using your Personal Information for their own purposes.
- Our Business Partners: We may disclose relevant Personal Information to our business partners, for example to provide you with offers and discounts for products and services that may interest you.

See the tables above for more details about how different categories of Personal Information are disclosed.

We do not sell Personal Information to anyone. We do not share Personal Information for advertising purposes.

Exercising Your Personal Information Rights

California Employees and Applicants have the following rights under California privacy laws:

- The right to know the Personal Information we have collected about them, including the categories of sources from which we collected the Personal Information, the purpose(s) for collecting, selling, or sharing your Personal Information, and the categories of third parties to whom we have disclosed your Personal Information;
- The rights to correct, or delete Personal Information;
- The right to limit the use of Sensitive Personal Information in certain circumstances;
- The rights to opt out of targeted advertising, sales of Personal Information, or profiling; and
- The right not to receive discriminatory treatment for exercising their privacy rights.

If you are a California Employee or Applicant, you can submit a request to exercise your Personal Information rights under California privacy laws by visiting www.myndm.com clicking on the CPRA - CA request form, or by emailing privacy@myndm.com.

To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will verify your identity by Review ADP records and Electronic Personnel File to validate contact information. If you do not complete the verification process, we may be unable to process your request. Any information you provide to authenticate your identity will only be used to process your rights request and not for any other purpose. Please be aware that we do not accept or process rights requests submitted through other means.

We will respond to your rights request within 45 days (or 15 days for requests to opt-out of the sale of Personal Information, requests to opt-out of targeted advertising, and requests to limit the use of

Sensitive Personal information), though in certain cases we may inform you that we will need up to another 45 days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Also note that each of the rights are subject to certain exceptions. We reserve the right to decline to process, or charge a reasonable fee for, requests from a Employee or Applicant that are manifestly unfounded, excessive, or repetitive.

Notice of Right to Limit the Use of Sensitive Personal Information

You have the right to limit some uses of Sensitive Personal Information. In general, you may direct companies not to use Sensitive Personal Information except as necessary to provide goods or services you have requested or other exempt purposes.

However, we only use Sensitive Personal Information for purposes that are exempt from this right, such as to provide you with goods or services you have requested, to detect and prevent security incidents, or verifying the quality of our goods and services. The full list of these exempt purposes are specified in California Code of Regulations, Title 11, Section 7027(m).

Children's Data

We do not knowingly collect or use the Personal Information of children under 16. If you believe that we have collected the Personal Information of a child under 16, please contact us at privacy@myndm.com.

Authorized Agent Requests

California privacy law allows you to designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require verification of your authorized agent in addition to the information for verification above for Employees and Applicants and households.

Contact Us

If you have any questions or concerns regarding this California HR Privacy Notice, contact us at privacy@myndm.com.

Last updated: January 10, 2024