Privacy Policy for California Residents

This Privacy Policy for California Residents supplements the information contained in S.O.S. Loans' Privacy Policy & <u>Terms of Use</u> and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

Notice at Collection

Data Collection

We currently collect the categories of personal information listed in the chart below and we may use the data for the purposes identified for each category. As permitted by applicable law, we may use and disclose all of the personal information that we collect in order to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that we, a service provider, or a third party reasonably and in good faith believe may violated federal, state, or local law;
- Exercise or defend legal claims; and
- Collect, use, retain, sell, or disclose consumer information that is deidentified or in the aggregate consumer information.

| Category of Personal Information | Examples and Purposes |
|-------------------------------------|---|
| Identifiers | Examples : A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, Social Security number, or |

other similar identifiers. **Purposes for Which Category Will Be Used: We use** this category of personal information: To fulfill or meet the reason for which the information is provided. • To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. **Examples**: A name, signature, Social Security number, address, telephone number, employment, employment history, bank account number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories. Personal **Purposes for Which Category Will Be Used:** We use information this category of personal information: categories listed in the California • To fulfill or meet the reason for which the **Customer Records** information is provided. statute (Cal. Civ. • To provide you with information, products or Code § 1798.80(e)) services that you request from us directly or indirectly. • For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA.

| Protected classification characteristics under California or federal law | Examples: Age (40 years or older), or veteran or military status. Purposes for Which Category Will Be Used: We use this category of personal information: To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
|--|---|
| Internet or other similar network activity | Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. Purposes for Which Category Will Be Used: We use this category of personal information: To fulfill or meet the reason for which the information is provided. To provide you with information, products or services that you request from us directly or indirectly. To improve our website and present its contents to you. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |

| Geolocation data | Examples: Physical location or movements. Purposes for Which Category Will Be Used: We use this category of personal information: To provide you with information, products or services that you request from us directly or indirectly. To improve our website and present its contents to you. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
|--|--|
| Professional or employment-related information | Examples: Current or past job history. Purposes for Which Category Will Be Used: We use this category of personal information: To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |

Additional Data Collection and Uses:

We will not collect categories of personal information other than those discussed above without providing a new notice at collection. In addition, we will not use your personal information for any other purpose other than those disclosed above. If we intend to use your personal information for a purpose that was not previously

disclosed in the notice at collection, we will directly notify you of the new use and obtain consent from you to use it for the new purpose.

Personal Information Collection During Last 12 Months

Personal Information Collected

We have collected the categories of personal information identified in the chart below during the preceding 12 months, and we used that data for the purposes identified under each category.

| Category of Personal Information | Examples, Categories of Sources, and Purposes |
|-------------------------------------|--|
| | Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or Social Security number. Categories of Sources: Directly or indirectly from the consumer. |
| Identifiers | Business or Commercial Purposes for Collecting: We use this category of personal information: To fulfill or meet the reason for which the information is provided. To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
| | Categories of Third Parties with Whom We Share Personal Information: We have shared this category |

of personal information with the following categories of third parties: • Service providers (e.g. marketing, site administration) **Examples**: A name, signature, Social Security number, address, telephone number, employment, or employment history. Some personal information included in this category may overlap with other categories. Categories of Sources: Directly or indirectly from the consumer. **Business or Commercial Purposes for Collecting: We** Personal use this category of personal information: information • To fulfill or meet the reason for which the categories listed in the California information is provided. **Customer Records** • To provide you with information, products or statute (Cal. Civ. services that you request from us directly or Code § 1798.80(e)) indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. **Categories of Third Parties with Whom We Share Personal Information**: We have shared this category of personal information with the following categories

of third parties:

| | Service providers (e.g. marketing, site administration) |
|--|---|
| Protected classification characteristics under California or federal law | Examples : Age (40 years or older), or veteran or military status. |
| | Categories of Sources: Directly from the consumer. |
| | Business or Commercial Purposes for Collecting : We use this category of personal information: |
| | To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
| | Categories of Third Parties with Whom We Share Personal Information: We have shared this category of personal information with the following categories of third parties: • Service providers (e.g. marketing, site administration) |
| Internet or other similar network activity | Examples : Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. |
| | Categories of Sources: Directly or indirectly from the consumer |

Business or Commercial Purposes for Collecting: We use this category of personal information:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or services that you request from us directly or indirectly.
- For analysis.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Categories of Third Parties with Whom We Share Personal Information: We have shared this category of personal information with the following categories of third parties:

Service providers (e.g. marketing, site administration)

Professional or employment-related information

Examples: Current or past job history.

Categories of Sources: Directly from the consumer

Business or Commercial Purposes for Collecting: We use this category of personal information:

- To provide you with information, products or services that you request from us directly or indirectly.
- For analysis.

 As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Categories of Third Parties with Whom We Share Personal Information: We have shared this category of personal information with the following categories of third parties:

 Service providers (e.g. marketing, site administration)

Personal Information Excluded from CCPA's Scope

The CCPA provides for certain exemptions which excludes certain personal information from the CCPA's scope. Among these exemptions is personal information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act ("GLBA"). Therefore, for example, if you have submitted an application for a loan with S.O.S. Loans or are a customer of S.O.S. Loans, any information you provided in that application and in connection with your S.O.S. Loans account is covered under the GLBA and the information contained in the following federal privacy notice pertains to you: GLBA Privacy Notice.

Personal Information Disclosed for a Business Purpose During Last 12 Months

Personal Information Disclosed

We have disclosed the categories of personal information identified in the chart below during the preceding 12 months, and we used that data for the purposes identified under each category. Prior to disclosing any personal information to a third party for a business purpose, we enter into a written contract which describes the specific purpose which the personal information can be used by the third party to perform the services specified in the contract, requires the third party to both keep any personal information confidential, and prohibits the third party receiving the personal information from retaining, disclosing, or using the personal

information for any purpose other than performing and providing services under the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third parties for a business or commercial purpose:

| Category of Personal Information | Examples and Purposes |
|---|---|
| | Examples : A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, Social Security number, or other similar identifiers. |
| | Business or Commercial Purposes for Disclosing : We share this category of personal information to: |
| Identifiers | To fulfill or meet the reason for which the information is provided. To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
| Personal information categories listed in the California Customer Records | Examples : A name, signature, Social Security number, address, telephone number, employment, employment history, bank account number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories. |
| statute (Cal. Civ. Code § 1798.80(e)) | Business or Commercial Purposes for Disclosing : We share this category of personal information to: |

| | To fulfill or meet the reason for which the information is provided. To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
|--|---|
| Protected classification characteristics under California or federal law | Examples: Age (40 years or older), veteran or military status. Business or Commercial Purposes for Disclosing: We share this category of personal information to: To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |
| Internet or other similar network activity | Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. Business or Commercial Purposes for Disclosing: We share this category of personal information to: To fulfill or meet the reason for which the information is provided. |

| | To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. To improve our website. |
|--|---|
| Professional or employment-related information | Examples: Current or past job history. Business or Commercial Purposes for Collecting: We use this category of personal information to: To provide you with information, products or services that you request from us directly or indirectly. For analysis. As described to you when collecting your personal information or as otherwise set forth in the CCPA. |

Personal Information Sold

In the preceding twelve (12) months, we **have not sold** any personal information.

California Consumer Rights

Do Not Sell My Personal Information

Under the California Consumer Privacy Act (CCPA), you have the right to direct us to stop selling your personal information to third parties and to refrain from doing so in the future. For purposes of the CCPA, we do not and will not sell personal information as defined under applicable law.

CCPA Requests to Know and Requests to Delete

As described in more detail below, the CCPA gives consumers the right to request that we (1) disclose what personal information we collect, use, disclose, and sell, and (2) delete certain personal information that we have collected or maintain. You may submit these requests to us as described below, and we honor these rights where they apply.

However, by way of example, these rights do not apply where we collect or sell a consumer's personal information if (1) we collected that information while the consumer was outside of California; (2) no part of a sale of the consumer's personal information occurred in California, and (3) no personal information collected while the consumer was in California is sold. In addition, de-identified and/or aggregated information is not subject to these rights.

If a request is submitted in a manner that is not one of the designated methods for submissions, or if the request is deficient in some manner unrelated to our verification process, we will either (1) treat the request as if it had been submitted in accordance with the designated manner, or (2) provide you with specific directions on how to submit the request or remedy any deficiencies within the request, as applicable.

Request to Know

As described below, you have the right to request:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose(s) for which the personal information was collected, disclosed, or shared;
- The categories of third parties to whom
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we have collected about you
- If we disclosed your personal information for a business purpose, a list disclosing disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Our response will cover the 12-month period preceding our receipt of a verifiable consumer request.

<u>Submission Instructions</u>: You may submit a request to know by calling 1-800-503-6648, or submitting a request through our website (https://sosloans.com).

<u>Verification Process</u>: We are required by law to verify the identities of those who submit requests to know, and our verification process is described in detail below. WE will inform you if we cannot verify your identity.

- a. If we cannot verify the identity of the person making a request for categories of personal information, we may deny the request. If the request is denied in whole or in part for this reason, we will provide a copy of, or direct you to, our privacy policy.
- b. If we cannot verify the identity of the person making the request for specific pieces of information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer.
- c. If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response and explain why we have no reasonable method by which we can verify the identity of the requestor.

Response Process: Upon receiving a request to know, we will confirm receipt of the request within ten (10) days and provide information about how we will process your request. The information provided will describe our verification process and when you should expect a response from us. In general, we will respond to the request within forty-five (45) days from the day we receive it; but, if necessary, we may take up to an additional forty-five (45) days to respond to your request. If an extension is needed, we will notify you of the extension and explain the reasons that responding to your request will take more than forty-five (45) days.

Once verification is complete, we will associate the information provided by you in the verifiable consumer request to any personal information previously collected by us about you. We will promptly take steps to disclose and deliver, free of charge to you, the information requested. We will provide an individualized response to requests regarding categories of personal information as required by applicable law, but, we may refer you to our general practices outlined in this Policy when our response would be the same for all consumers and all the information that is otherwise required to be in a response is presented here.

We may respond to a request to know related to household personal information by providing aggregate household information. If all consumers of a household jointly request access to specific pieces of personal information for the household, we will comply with the request if we can verify the identity of each consumer.

<u>Delivery</u>: Except as otherwise provided by applicable law, the information will be provided in writing. We will respond by mail. If we do not take action on your request, we will, without delay and, at the latest, within the time period permitted for our response, inform you of the reasons that we did not take action and any rights you may have to appeal the decision.

<u>Limitations</u>: We are committed to responding to requests to know in accordance with applicable law. However, your rights are subject to the following limitations:

- a. We are only required to respond to requests to know twice in a twelve (12) months period.
- b. We are not permitted to provide specific pieces of personal information if the disclosure creates a substantial, articulable, and unreasonable risk to (1) the security of that personal information; (2) the consumer's account with us, or (3) the security of our systems or networks;
- c. We are prohibited from disclosing Social Security numbers, driver's license numbers, other government-issued identification numbers, financial account numbers, health insurance numbers, medical identification numbers, account passwords, and security questions and answers.

<u>Denials</u>: If we deny a verified request to know specific pieces of personal information, in whole or in part, because of a conflict with federal or state law, or an exception under applicable law, we will inform the requestor and explain the basis for the denial. If the request is denied only in part, we will disclose the other information sought by the consumer.

Request to Delete

You have the right to request the erasure/deletion of certain personal information collected or maintained by us. As described below, we will delete your personal information from our records and direct any service providers (as defined under applicable law) to delete your personal information from their records.

<u>Submission Instructions</u>: You may submit a request to delete You may submit a request to know by calling 1-800-503-6648, visiting one of our branches, or submitting a request through our website (https://sosloans.com). We may present you with the choice to delete select portions of your personal information, but a global option to delete all personal information will be offered and more prominently presented.

<u>Verification Process</u>: We are required by law to verify the identities of those who submit requests to know, and our verification process is described in detail below. We will inform you if we cannot verify your identity.

- a. If we cannot verify the identity of the person making the request to delete, we may deny the request. We will, however, treat the request as a request to opt-out of sales of personal information.
- b. If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response an explain why we have no reasonable method by which we can verify the identity of the requestor.

Response Process: Upon receiving a request to delete, we will confirm receipt of the request within ten (10) days and provide information about how we will process your request. The information provided will describe our verification process and when you should expect a response from us (unless we have already granted or denied the request). We will use a two-step process for online requests to delete in which you must first, clearly submit the request to delete and then second, separately confirm that you want your personal information deleted. In general, we will respond to the request within forty-five (45) days from the day we receive it; but, if necessary, we may take up to an additional forty-five (45) days to respond to your request. If an extension is needed, we will notify you of the extension and explain the reasons that responding to your request will take more than forty-five (45) days.

Once verification is complete, we will take one of the following actions: (1) permanently and completely erase the personal information on our existing systems (with the exception of archived or back-up systems); (2) de-identify the personal information; or (3) aggregate the personal information. For personal information stored

We may respond to a request to know related to household personal information by providing aggregate household information. If all consumers of a household jointly request access to specific pieces of personal information for the household, we will comply with the request if we can verify the identity of each consumer.

<u>Delivery</u>: In our response to you, we will specify the manner in which we deleted your personal information. We will also inform you of our obligation to maintain a record of the request under California law.

<u>Limitations</u>: We are committed to responding to requests to delete in accordance with applicable law. However, we are not required to delete your personal information if it is necessary for us (or our service providers) to maintain your personal information in order to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- 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;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation;
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

<u>Denials</u>: If we deny your request to delete, we will (1) inform you that we will not comply with the request and describe the basis for the denial, including any

applicable statutory and regulatory exceptions; (2) delete the personal information that is not subject to the exception; and (3) not use the personal information retained for any other purpose than provided for by the applicable exception(s).

Verification Procedures

To determine whether the individual making the request is the consumer about whom we collected information, we will verify your identity by matching the identifying information provided by you in the request to the personal information that we already maintain about you. As part of this process, you will be required to provide your full name, address, and phone number.

If we cannot verify your identity based on the information already maintained, we may request additional information from you. We will try to limit the information collected, and we will only use this information to verify your identity and for security or fraud-prevention purposes. Except as required by law, we will delete any new personal information collected for the purposes of verification as soon as practical after processing the request.

We require different levels of authentication based upon the nature of the personal information requested. A more stringent verification process is applied when (1) sensitive or valuable personal information is involved, (2) there is a greater risk of harm to the consumer, and/or (3) there is a higher likelihood that fraudulent or malicious actors would request the information.

Request to Know Categories: For a request to know categories of personal information, we will verify the identity of the consumer making the request to a "reasonable degree of certainty" by matching at least two (2) data points provided by the consumer with data points maintained by us, which we have determined to be reliable for the purpose of verifying the consumer.

Request to Know Specific Pieces: For a request to know specific pieces of personal information, we will verify the identity of the consumer making the request to a "reasonably high degree of certainty" by matching at least three (3) pieces of personal information provided by the consumer with personal information maintained by us, which we have determined to be reliable for the purpose of verifying the consumer, together with a signed declaration under penalty of perjury that the requestor is the consumer whose personal information is the

subject of the request. We are required by law to maintain all signed declarations as part of our record-keeping obligations.

Request to Delete: For a request to delete, we will verify the identity of the consumer to a "reasonable degree of certainty" or a "reasonably high degree of certainty," depending on the sensitivity of the personal information and the risk of harm to the consumer posed by unauthorized deletion. For example, the deletion of family photographs and documents may require a reasonably high degree of certainty, while the deletion of browsing history may require a reasonable degree of certainty.

Authorized Agents: You may designate an authorized agent to make requests on your behalf by sending us written authorization in writing at Privacy Policy Manager, 3655 Torrance Blvd, Suite 425, Torrance, CA 90503-4844. If you use an authorized agent to submit a request to know or a request to delete, we may require you to: (1) provide the authorized agent with written permission to do so; and (2) verify your identity directly with us. However, we will not require these actions if you have provided the authorized agent with power of attorney pursuant to the California Probate Code. We may deny a request from the agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

Excessive Requests: If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

Non-Discrimination

You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the California Consumer Privacy Act. We do not offer financial incentives and price or service differences, and we do not discriminate against consumers for exercising their rights under the CCPA.

Changes and Updates to This Privacy Policy

We reserve the right to amend, add to, change, update, or modify this Privacy Policy at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage. If we make material changes to how we treat your personal information, we will also notify you through a notice on the home page of the website for a reasonable period of time. Any such changes, updates, or modifications shall be effective immediately upon posting this Privacy Policy. The data on which this policy was last modified is identified at the beginning of this Policy.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to lodge a complaint with us, you may contact us using the information below and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail or telephone:

In Writing: Privacy Policy Manager, 3655 Torrance Blvd, Suite 425, Torrance, CA 90503-4844

By Telephone: 1-800-503-6648

Last Revised and Effective: January 1, 2020