

First Heritage Mortgage Privacy Policy

California Consumer Privacy Act (CCPA) Notice

First Heritage Mortgage (“FHM” or “Company” or “us” or “we”) is committed to protecting the privacy and security of the personal information it collects. This Privacy Notice for California Residents (“Privacy Notice”) supplements the [First Heritage Mortgage Privacy Policy](#) and only applies to residents of the State of California (“consumers,” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

Introduction

Under the CCPA, “personal information” means information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household and applies to California residents only. This Privacy Notice explains how we collect, use, and share your personal information. It also describes your privacy rights and our obligations under the CCPA regarding your personal information. However, please note that your privacy rights and our obligations described herein do not apply to certain personal information. For example, your privacy rights and our obligations in this Privacy Policy do not apply to personal information collected, processed, sold, or disclosed under the federal Gramm-Leach-Bliley Act (“GLBA”) and its implementing regulations. Please see FHM’s Privacy Policy to learn how we collect, share, and protect information covered under GLBA.

Information We Collect

We collect information that identifies, relates to, describes, and references is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). As shown in the chart on Page 2 of this document, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Personal information categories are listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e))	Name, signature, Social Security Number, address, telephone number, passport number, driver's license or state identification card number, date of birth, education, employment, employment history, tax returns, income, credit history, credit scores, payment history, retirement account balance, retirement account number, checking and savings account balance, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), veteran or military status.
Commercial information	Records of personal property, assets, rental history, products, services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Professional or employment-related information	Work history and/or employer's information.
Internet or other similar network activity	Browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement.
Sensory data	Audio, electronic, visual, or similar information.
Biometric information	Keystrokes.
Geolocation data	Physical location or movements.
Inferences are drawn from the above-listed personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records.
- De-identified 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 is covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following types of sources:

- Directly from our clients or their agents. For example, from documents, our clients provide related to the services they engage us.

- Indirectly from our clients or their agents. For example, through information we collect from our clients while providing services to them.
- Directly and indirectly from activity on our website (www.apmortgage.com). For example, submissions through our website portal or website usage details are collected automatically.
- From third parties that interact with us in connection with our services. For example, from government agencies when we verify certain identifying information or tax-related information.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- Performing services, including offering, processing, underwriting, making, or servicing residential mortgage loans.
- Developing and carrying out marketing activities
- Providing customer support and managing our relationship with you
- Creating, maintaining, and securing your loan account
- Auditing or quality control
- Complying with applicable law, agency requirements, or investor requirements
- To improve our website and present its contents to you.
- When or if applicable, to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sale of Personal Information

We do not sell, will not sell, and have not sold personal information to third parties in the past 12 months, including personal information of minors under age 16.

Sharing Personal Information

We may disclose your personal information to a third party for business purposes. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to keep it confidential and not use it for any purpose except the agreement.

We disclose your personal information for business purposes to the following categories of third parties:

- Our affiliates, if applicable.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information concerning products or services we provide to you.

We have not sold any personal information in the preceding twelve (12) months.

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.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you the following:

- 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 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.

Rights to Correct

You may request FHM to correct inaccurate information we have about you.

Right to Request Deletion

You have the right to request that we delete any personal information we collected from you and retain it subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from ours and their records unless an exception applies.

We may deny your deletion request if retaining the information is necessary for our service providers or us to:

1. Complete the transaction for which we collected the personal information, provide a good or service you requested, take reasonably anticipated actions within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Comply with federal laws that require us to retain data and records for a minimum period.
3. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such actions.
4. Debug products to identify and repair errors impairing intended functionality.
5. Exercise free speech, ensure the right of another consumer to exercise their free speech rights or exercise another right provided for by law.
6. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
7. 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.
8. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
9. Comply with a legal obligation.
10. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Opt-Out of Sale or Sharing

You may request FHM to stop sharing your personal information (“opt-out”), including via a user-enabled global privacy control. FHM may not sell or share your personal information after receiving your opt-out request unless you authorize us to do so again.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 877.218.8362
- Emailing us at optout@fhmtg.com

Only you or a person registered with the California Secretary of State 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 12 months. The verifiable

consumer request must:

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

We cannot respond to your request or provide personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. Making a verifiable consumer request does not require creating 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.

Response Timing and Format

We will work to respond to a verifiable consumer request within 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. Our disclosures will only cover the 12 months before receipt of the verifiable consumer request. Our response will also explain why 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 a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge different prices or rates for goods or services, including by granting discounts or other benefits or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.



Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. We will notify you by email or message on our website homepage when we change this privacy notice.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, how we collect and use your personal information, your choices, and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 877.218.8362

Website: www.fhmtg.com/optout

Email: optout@fhmtg.com

Postal Address: 3201 Jermantown Road, Suite 800, Fairfax, VA 22030

REVIEWED/UPDATED:
November 2023

First Heritage Mortgage, LLC | 3201 Jermantown Road, Suite 800 | Fairfax, VA 22030

P 703.352.0721 | 866.833.LOAN **E** info@fhmtg.com **W** fhmtg.com

Company NMLS ID #86548 (www.nmlsconsumeraccess.org)

