

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective Date: January 1, 2020

This Privacy Notice for California Residents supplements and is expressly made part of the information contained in Guaranteed Rate Affinity, LLC's [Privacy Policy](#) 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 other applicable laws. Any terms defined in the CCPA have the same meaning when used in this Notice.

Information We Collect

Our Websites may collect information 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, our Websites may have collected the following categories of personal information from consumers since January 1, 2020, the effective date of the CCPA:

Category	Examples (not all will be collected)	Collected
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.	YES

	Some personal information included in this category may overlap with other categories.	
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).	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
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.	YES
G. Geolocation data	Physical location or movements.	YES
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.	YES
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

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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Guaranteed Rate Affinity, LLC obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Websites.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- From third-party business partners such as social media sites, ad networks, and analytics providers.

Use of Personal Information

We use information to offer products and services to you, fulfill your requests, improve the quality of our products and services, engage in research and analysis relating to our products and services, personalize your experience, track usage of our Website, market the our products and services, provide customer support, message you, back up our systems, allow for disaster recovery, enhance the security of our Website, and comply with legal obligations. Even when we do not retain such information, it still must be transmitted to our servers initially and stored long enough to process.

We also use information that we collect about you or that you provide to us, including any Personal information:

- To present the content of our products and services to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our products or services we offer or provide though it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop our Websites, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Websites, third-party sites, and via email or text message (with your consent, where required by law).

- To help maintain the safety, security, and integrity of our Websites, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Websites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Guaranteed Rate Affinity, LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Guaranteed Rate Affinity, LLC about our Website users is among the assets transferred.

Guaranteed Rate Affinity, LLC 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.

Sharing Personal Information

Guaranteed Rate Affinity, LLC may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Subsidiaries and affiliates.
- Service providers.
- Third parties with whom we partner with to offer products and services to you.
- Data aggregators.

Disclosures of Personal Information for a Business Purpose

Since January 1, 2020, Guaranteed Rate Affinity, LLC has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category I: Current or past job history or performance evaluations.

Sales of Personal Information

Guaranteed Rate Affinity, LLC has not sold personal information since January 1, 2020, the effective date of the CCPA.

Your California Privacy Rights

We do not share personal information (as defined by California Civil Code § 1798.83) with other people or non-affiliated businesses for their direct marketing purposes. Our websites do not respond to browser do-not-track signals.

Under the California Consumer Privacy Act of 2018 (“CCPA”), California consumers have the right to request:

- the deletion of the personal information we have about them
- additional information about whether and how we have collected, used, disclosed, and sold personal information about them
- the specific pieces of personal information we have about them

California consumers also have the right not to receive discriminatory treatment if they exercise the rights listed above.

When you make a request, we may require that you provide information and follow procedures so that we can verify the request and your jurisdiction before responding to it. The verification steps we take may differ depending on the request you make. We will match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us verify your request.

Consumers will be required to submit their first and last name and email address and may also be asked to provide their telephone number or address so that we can verify the request. Please provide as much of the requested information as possible to help us verify the request. We will only use the information received in a request for the purposes of responding to the request.

California law permits California consumers to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California consumer’s written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California consumer. An authorized agent must follow the process described below to make a request. The authorized agent must also verify his/her own identity. We will confirm the agent’s authority with the California consumer about whom the request was made.

You may submit a privacy rights request to us by:

- Visiting our Data Subject Access Request (“DSAR”) portal [here](#)
- Calling us at 888-844-9888
- Sending us a letter to:

Guaranteed Rate Affinity, LLC
Attn: Compliance Officer
1800 W. Larchmont
Chicago, IL 60613

Changes to Our Privacy Notice

Guaranteed Rate Affinity, LLC 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 the Websites and update the Notice's effective date. Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this Notice, the ways in which Guaranteed Rate Affinity, LLC collects and uses your information described above, 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: 888-844-9888

Email: privacy@grarate.com

Sending a letter to us at:

Guaranteed Rate Affinity, LLC
Attn: Compliance Officer
1800 W. Larchmont
Chicago, IL 60613

DISCLOSURE FOR CALIFORNIA USERS: GRA AND OTHER PARTIES NOT AFFILIATED WITH US MAY COLLECT PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOUR ONLINE ACTIVITIES OVER TIME AND ACROSS DIFFERENT WEBSITES WHEN YOU USE OUR WEBSITE OR THE SERVICES OFFERED ON OUR WEBSITE. WE DO NOT HAVE ANY PROTOCOL THAT OFFERS YOU THE CHOICE TO OPT-OUT OF INTERNET TRACKING. AT PRESENT TIME, THE GRA WEBSITE IS UNABLE TO RESPOND TO "DO NOT TRACK" SIGNALS FROM YOUR INTERNET BROWSER. IF YOU HAVE ANY QUESTIONS REGARDING OUR INTERNET TRACKING METHODS PLEASE EMAIL US AT compliance@grarate.com.