

U.S. State Privacy Law Notice at Collection

Last Updated: 09/23/2025

This U.S. State Privacy Law Notice at Collection supplements the information contained in First Residential Independent Mortgage's Online Privacy Notice (<https://www.FirstResidential.com/privacy/>) and applies solely to all visitors, users, and others who reside in the State of California or any other applicable state privacy law ("consumers" or "you"). We adopt this notice to comply with applicable state privacy laws, such as the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act (CPRA). Any terms defined in the CCPA, CPRA, and any other applicable state privacy law have the same meaning when used in this Notice.

Commented [BR1]: Is this the right URL?

Information We Collect

We collect 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, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Lawfully obtained, truthful information that is a matter of public concern.
- Deidentified or aggregated consumer information.
- Information excluded from the scope of applicable state privacy laws, like:
 - 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 (CFIPA), and the Driver's Privacy Protection Act of 1994.

Your Personal Information

We do not sell the sensitive personal information we collect.

We collect the following categories of personal information and sensitive personal information listed in the tables below. The tables also list, for each category, our use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

Data Retention

We store your personal information for different lengths of time depending on the category of personal information and the purpose for its collection and use. We will retain your data for as long as needed, or permitted, based on the reason why we obtained it. We will not retain personal information for longer than is reasonably necessary for any disclosed purposes. This means we may retain your personal information even after you close your account with us. Some information may be deleted automatically based on specific

schedules, such as financial information. Other information (e.g., account information), may be retained for a longer period of time. Finally, we may further retain information for business practices based on our legitimate business interests or legal purposes, such as network improvement, fraud prevention, record-keeping, or enforcing our legal rights or defending legal claims.

When deciding how long to keep your information, we consider criteria, such as:

- The duration, and nature, of any relationship with you or service that we have provided to you;
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them); or
- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation or in response to any legal hold or regulatory requests).

Rather than delete your data, we may de-identify it by removing identifying details.

Notice of Information Collected

In the preceding 12 months, we have collected and disclosed the following categories of personal information for business or commercial purposes.

Personal Information Category	Business Purpose	Collected	Disclosed	Category of Third Parties and Processors Disclosed to For Business Purposes
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.	Performing services, providing financial and customer service; providing online products and services; for marketing and advertising purposes; providing customer service; protection against fraud.	Yes	Yes	<ul style="list-style-type: none">• Service Providers• Affiliates• Government Agencies and Regulators

<p>California Customer Records personal information: 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.</p> <p>Some personal information included in this category may overlap with other categories.</p>	Protecting against fraud and providing financial services.	Yes	Yes	<ul style="list-style-type: none"> • Service Providers • Affiliates • Government Agencies and Regulators
<p>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</p>	Performing services and complying with state and federal law.	Yes	Yes	<ul style="list-style-type: none"> • Service Providers • Government Agencies and Regulators
<p>Commercial information: Records of personal property, products or services purchased, obtained, or</p>	Providing online products and services; for marketing and advertising purposes; providing customer service.	Yes	Yes	<ul style="list-style-type: none"> • Service Providers • Affiliates

considered, or other purchasing or consuming histories or tendencies.				<ul style="list-style-type: none">• Government Agencies and Regulators
Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Providing online products and services; for marketing and advertising purposes.	Yes	Yes	<ul style="list-style-type: none">• Service Providers• Affiliates
Geolocation data: Physical location or movements.	Detecting security incidents or fraud; debugging mobile application.	Yes	Yes	<ul style="list-style-type: none">• Service Providers
Professional or employment-related information: Current or past job history or performance evaluations.	Providing financial services.	Yes	Yes	<ul style="list-style-type: none">• Service Providers• Government Agencies and Regulators
Inferences drawn from other personal information: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Providing financial and customer service; for marketing and advertising purposes.	Yes	No	<ul style="list-style-type: none">• N/A
Sensitive Personal Information Category	Business Purpose	Collected	Disclosed	Category of Third Parties and Processors

				Disclosed to For Business Purposes
Government identifiers (social security, driver's license, state identification card, or passport number)	Performing services, providing financial and customer service; providing online products and services; for marketing and advertising purposes; providing customer service; protection against fraud.	Yes	Yes	<ul style="list-style-type: none"> • Service Providers • Government Agencies and Regulators •
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	Providing online products and services; providing customer service.	Yes	No	<ul style="list-style-type: none"> • N/A
Racial or ethnic origin	Performing services and complying with state and federal law.	Yes	Yes	<ul style="list-style-type: none"> • Service Providers • Government Agencies and Regulators

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

- Directly from you. For example, from forms you complete, mortgage applications, or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Websites.
- From our affiliates.
- From third parties, such as an internet advertiser, a mortgage lead generator, your prior mortgage servicer, or government entities from which public records are maintained.
- From our service providers and contractors, who we engage to further our business purposes

We also collect demographic information. Demographic information is all other information such as gender, zip code, or any information that is not tied to your personal information. In addition, we may receive information about you from other online or offline sources, including third parties from whom we validate consumer self-reported information, and verify information we already have about you. This helps us to update, expand and analyze our records and provide products and services that may be of interest to you.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to apply for a loan or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our Website, 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 Website, 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 Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, 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 applicable state privacy laws.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.
- For auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- To help ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes.
- For debugging to identify and repair errors that impair existing intended functionality.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us, provided that your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us.
- To perform services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.

- To provide advertising and marketing services to you.
- For undertaking internal research for technological development and demonstration.
- For undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- To advance a person's commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

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.

Use of Sensitive Personal Information

We may use or disclose the sensitive personal information we collect for one or more of the following purposes, provided that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose:

- To perform the services reasonably expected by your request.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To perform services on behalf of our business such as maintaining or servicing accounts, providing customer service, verifying customer information, processing payments, or providing financing.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business.
- To verify or maintain the quality or safety of a service, that is owned, or controlled by us, and to improve, upgrade, or enhance the service that is owned, or controlled by us.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For purposes that do not infer characteristics about you.

We will not collect additional categories of sensitive personal information or use the sensitive personal information we have collected for materially different, unrelated, or incompatible purposes without providing you notice. We do not use or disclose sensitive personal information for any purpose other than those permitted under California Consumer Privacy Act regulations.

Disclosing Personal Information

We may disclose your personal information to certain parties, like a service provider, 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 or as otherwise permitted by you. Certain state privacy laws prohibit third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

For example, we may disclose your personal information with:

- **Service providers** who assist us in verifying your information, processing transactions, maintaining your account, or providing customer support.
- **Affiliates** who support our business operations, regulatory compliance, and customer services, including providing marketing and analytics support, capturing performance metrics, assisting with financial and administrative services, protecting the rights and safety of our company and customers, and in connection with corporate transactions such as mergers or acquisitions.

Sales and Shares of Personal Information

Various state privacy laws require businesses to make specific disclosures when they “sell” or “share” personal information, as defined under each state’s law. However, the definition of a “sale” or “share” differs from one state to another. In some states, a “sale” may include situations where we share personal information with affiliates or third parties in exchange for something of value. In others, it refers specifically to the transfer of personal data to unaffiliated third parties for monetary compensation. Under that narrower definition, we do not “sell” your personal information.

California and a few other state laws take a broader approach. According to California’s definition, we “share” personal information when we allow our Affiliates or certain third parties to use it in accordance with their own privacy policies, for cross contextual behavioral advertising, or for targeted advertising. We share your personal information with third-party advertising and marketing partners to deliver targeted marketing, and improve the relevance of displayed offers. Based on this standard, we “share” the following categories of personal information to the following types of third parties:

Personal Information Category	Sold	Shared	Category of Third Party Information Provided To
A. Identifiers	No	Yes	Marketing and Analytics Companies

Personal Information Category	Sold	Shared	Category of Third Party Information Provided To
B. Personal information categories listed in the California Customer Records statute (CA Civ. Code § 1798.80(e)).	No	Yes	Marketing and Analytics Companies
C. Protected classification characteristics under California or federal law.	No	No	N/A
D. Commercial information	No	Yes	Marketing and Analytics Companies
E. Biometric information	No	No	N/A
F. Internet or similar network activity	No	YES	Marketing and Analytics Companies
G. Geolocation data	No	No	N/A
I. Professional or employment related information	No	No	N/A
K. Inferences drawn from other personal information	No	YES	Marketing and Analytics Companies

Personal Information Category	Sold	Shared	Category of Third Party Information Provided To
L. Sensitive Personal Information	No	No	N/A

Your Rights and Choices

Certain state privacy laws provide their residents with specific rights regarding their personal information. This section outlines those rights and explains how to exercise those rights.

California residents who are employees, job applicants, or former employees of First Residential Independent Mortgage [click here to view our CCPA Notice for Employment Purposes](#).

Right to Know Request - Access to Specific Information and Data Portability Rights

In certain states, you have the right to request that we disclose certain information to you 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 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.
- If we disclosed your personal information for a business purpose the categories of information we shared.

Information we collect or share in our role as a financial institution may not be included in your Right to Know response.

If you request that we disclose the required information beyond the 12-month period, then we shall provide that information unless doing so proves impossible or would require a disproportionate effort. Your right to request required information beyond the 12-month period, and our obligation to provide that information, only applies to personal information collected on or after January 1, 2022.

Deletion Request Rights

In certain states, you have the right to request that we 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, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes
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.

Right to Correct Inaccurate Information

In certain states, you have the right to request that we correct any inaccurate personal information that we maintain about you. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. In responding to your request, we will take into account the nature of the personal information, and the purposes of the processing of the personal information.

Your Right to Opt-Out of Information Sharing and Targeted Advertising

Certain state privacy laws require us to inform you when we share your personal information with third parties for advertising purposes. In this context, "sharing" refers to making your information available to third parties for cross-context behavioral advertising—that is, delivering ads to you based on data collected from your interactions across different websites, apps, or services that are not part of our own platform.

Similarly, other state laws require notice if we use your personal information for targeted advertising. This practice involves selecting ads for you based on insights drawn from your online activity over time and across unrelated websites and applications, in order to predict your preferences and interests.

In line with these requirements, we do share certain categories of personal information—such as identifiers and online activity—with advertising partners to support both cross-context and targeted advertising efforts.

You have the right to opt-out of this type of data use. To exercise this right, you can visit our **Do Not Sell or Share My Personal Information** page, which is linked in the footer of our website. In addition, we respect browser-enabled Global Privacy Control (GPC) signals as part of our commitment to your privacy choices.

Commented [BR2]: Insert hyperlink to "Do Not Sell or Share My Personal Information"

We do not knowingly sell or share personal information about consumers under the age of 16.

Exercising a Consumer Rights Requests

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

- Calling us at 833-598-7643.
- Visiting: <https://www.FirstResidential.com/ccpa-request/>

Commented [BR3]: Double check URL name and change URL to be non-CCPA specific, such as:

<https://www.FirstResidential.com/data-subject-request>

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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.

Response Timing and Format

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 email to the primary email address that you submit with your request.

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.

Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights under applicable state privacy laws. . Unless permitted by applicable law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you 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. When we make changes to this privacy notice, we will post the updated notice on the 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 Information

If you have any questions or comments about this notice, the ways in which First Residential Independent Mortgage collects and uses your information described above and in our Privacy Policies, your choices and rights regarding such use, or wish to exercise your rights under California or any other applicable state law, please do not hesitate to contact us at:

Phone: 833-598-7643

Website: <https://www.FirstResidential.com/privacy/>

Postal Address:

Commented [BR4]: Is this the correct URL?

First Residential Independent Mortgage
Attn: First Residential Independent Mortgage Customer Service
1400 Forum Blvd. Ste. 18
Columbia, MO 65203