

California Consumer Privacy Act (“CCPA”) Notice for California Residents

This CCPA Notice for California Residents (“Notice”) is adopted to comply with the CCPA and other privacy laws. This Notice only applies to California residents (“consumers” or “you”) and supplements other privacy notices, policies, and/or disclosures Summit Funding, Inc. (“Summit” or “we” or “our”) may provide. Any terms defined in the CCPA have the same meaning when used in this Notice.

Information Collected in the Loan Process

With the exception of the “Information We Collect” section, this Notice does not address personal information collected, retained, or shared during the loan process (e.g., information included in a loan application, information needed to service the loan, etc.). This information is addressed in a separate privacy notice because it is regulated by a different law and is exempt from the CCPA.

Information We Collect

We 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”). We collect different types of information based on the circumstances. For example, a customer applying for a loan will need to provide certain types of personal information so we can determine eligibility. Different information would be collected about an employee, a vendor, or a person visiting our website.

The chart below shows the categories of personal information we collected from consumers within the last twelve (12) months. Unless otherwise stated, these are also the categories of personal information we may collect about you. Summit’s collection of a category of personal information does not mean it collects *each* of the items listed in the “Examples” section for that category. The examples listed are meant to illustrate the types of personal information which may fall into a given category.

Category	Examples	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. Some personal information included in this category may overlap with other categories.	YES

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.	YES
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.	YES

Personal information does not include:

- Publicly available information, such as 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 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.

Sources of Personal Information

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

- Directly from our customers or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our customers or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details which are collected automatically.
- From third-parties that interact with us in connection with the services we perform. For example, through customer credit checks or marketing activities.

Use of Personal Information

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

- To provide you with information, products or services that you request from us.
- To facilitate or complete a transaction you request from us.
- To provide you with email alerts, communications, and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and enhance your experience on our platforms.
- To detect security incidents.
- To verify customer information.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To retain, as needed, to comply with legal and other business-related obligations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information beyond what is listed in the table above, or use the personal information we collected about you for materially different, unrelated, or incompatible purposes, without providing you notice first.

Sale of Personal Information

Summit does not sell your personal information, including personal information of minors under 16 years old. Summit has not sold personal information over the past 12 months.

Sharing Personal Information

We 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.

In the preceding twelve (12) months, we have disclosed the following categories of CCPA-regulated personal information for a business purpose:

- A. Identifiers.
- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- C. Protected classification characteristics under California or federal law.
- D. Commercial information.
- F. Internet or other similar network activity.
- G. Geolocation Data
- I. Professional or employment-related information.

Unless otherwise noted, these are the categories of CCPA-regulated personal information about you we may disclose for a business purpose.

In the preceding twelve (12) months, we disclosed personal information to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Unless otherwise noted, these are the categories of third parties with which we may share your CCPA-regulated personal information.

Social Media

We include links to social media sites, such as LinkedIn, Facebook, and Twitter on our website. If you follow links to these websites or services, any information you contribute will be governed by the terms of use or privacy policies for those third-party websites, and may be visible to others.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Requests for Information

You have the right to request certain information about our collection and use of your personal information over the past 12 months. Upon receipt of your request and verification of your identity, we will disclose the requested information to you (unless exceptions apply) which may include 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 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 (“data portability request”).
- If we disclosed your personal information for a business purpose, the personal information categories that each category of recipient obtained.

For data portability requests, we may redact sensitive personal information such as social security numbers, driver’s license numbers, financial account numbers, passwords, or security questions.

Deletion Request Rights

You have the right to request that we delete personal information we collected from you and retained, subject to certain exceptions. You may request deletion of specific pieces of personal information, or all applicable personal information.

Once we receive your consumer request and verify your identity, we will confirm your request and delete (and direct applicable service providers to delete) your personal information from our records, unless an exception applies. Please note we are legally required to keep records of requests, but will limit the amount of personal information contained in those records to the extent possible.

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

1. Complete the transaction for which we collected the personal information, provide a product 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
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 *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.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

How to Exercise Your Rights Under the CCPA

Please submit requests to know and requests to delete through one of the following methods:

- Calling us at: 888-681-2208
- Filling out the webform on our website: <https://summitfunding.net/privacy-policy>
- Or emailing your request to us: privacy@summitfunding.net

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, can 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.
 - **Please do not provide any sensitive personal information (e.g., social security number, driver's license number, biometric information, etc.) in your request.** If this information is necessary to verify your identify, we will contact you.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot fulfill your request or provide your personal information if we cannot verify your identity or confirm your authority to make the request. 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.

Verifying Your Identity

Once your request is received and reviewed, we will begin the verification process. This involves matching data points to confirm your identity. You may need to provide additional information to verify your identity; this is to guard against the risk of Summit providing personal information to an unauthorized third party. If Summit cannot reasonably verify your identity, or if we determine you are not a California resident according to the definition in the CCPA, Summit will deny the request and provide a written explanation of its basis.

Response Timing and Format

Within 10 days of receipt of your request, we will send you a confirmation of receipt. We endeavor to respond to verifiable consumer requests within 45 days of receipt. If we require more time (up to 90 days), we will let you know in writing and explain the reason for the delay. Any disclosures we provide will only cover the 12-month period preceding receipt of the verifiable consumer request. The response we provide will also explain, if applicable, the reasons we cannot comply with a request. 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, unduly repetitive, or manifestly unfounded. If we determine a request warrants a fee, we will explain why and provide you a cost estimate before proceeding.

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 based on exercising your CCPA rights.
- 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.

Personal Information of Employees & Job Applicants

Personal information collected as a result of a California resident's status as an employee of Summit or job applicant is exempt from the CCPA's rights to know and to delete until January 1, 2021.

Changes to Our Privacy Notice

We reserve the right to amend this Notice at our discretion and at any time.

This Notice was last updated on 12/23/2019.

Contact Information

If you have any questions about this Notice, the ways we collect and use your personal information, your choices and rights regarding such use, or if you wish to exercise your rights under the CCPA, please do not hesitate to contact us at:

- Phone: 888-681-2208
- Email: privacy@summitfunding.net