

Privacy Policy

Effective Date: 01/01/2022

This Privacy Policy applies to your interaction with ChatMLO or any of its wholly owned subsidiaries, (collectively, “we” or “us”). We operate the <https://ChatMLO.com> website and related mobile applications for the solicitation, origination, servicing, and sale of mortgage loans (hereinafter referred to as the “Service”). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. As applicable, please see our U.S. Consumer Privacy Notice (<https://www.chatmlo.com/privacy-notice/>) for more information on how we may share information with affiliates and third parties. By using the Service, you agree to the collection and use of information in accordance with this policy and our U.S. Consumer Privacy Notice. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms of Use.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address;
- First name and last name;
- Phone number;
- Address, State, Province, ZIP/Postal code, City;
- Social Security Number;
- Employment information;
- Financial information such as your income, assets, and liabilities, as well as information about your savings, investments, insurance, and business; and
- Cookies and Usage Data.

We may also collect this information from a wide range of other sources in order to provide you the Service. These sources may include among others, employers, attorneys, banks, title insurers, insurance companies and credit reporting agencies. We may also use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

Usage Data

We may also collect information that your browser automatically sends whenever you visit our Service or when you access the Service by or through a mobile device (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access the Service with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Location Data

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customize our Service. You can enable or disable location services when you use our Service at any time by way of your device settings.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

Use of Data

We use the collected data for various purposes:

- To provide and maintain our Service;
- To notify you about changes to our Service;
- To contact you if there is a problem completing a transaction you requested or to discuss your account;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer support;
- To enable our financial services partners to implement automatic payments and funds transfer;
- To gather analysis or valuable information so that we can improve our Service;
- To monitor the usage of our Service;
- To detect, prevent and address technical issues; and
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

Transfer of Data

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. This policy may not constitute your entire set of privacy rights, as these may also vary from state to state. To be certain of your privacy rights, you may wish to contact the appropriate agency in your state that is charged with overseeing privacy rights of consumers.

Disclosure of Personal Data

Disclosure for Law Enforcement

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Legal Requirements

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;

- To protect and defend the rights or property of ChatMLO;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public; and
- To protect against legal liability.

Service Providers

We may employ third party companies and individuals to facilitate our Service, provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used (“Service Providers”). These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

How We Respond to Do Not Track Signals

Website and online service operators are required to disclose how they respond to web browser “do not track” signals or other similar mechanisms that allow you to choose regarding the collection of personal information about your online activities over time and across third party websites, to the extent the operator engages in that collection. We do not track your personal information over time and across third-party websites and, therefore, this requirement does not apply to us. Website and online service operators must also disclose whether third parties may collect personal information about your online activities over time and across different websites when you use the operator’s website or service. Third parties that have content or services on our website such as a social feature, analytics service, or an advertising partner, may obtain information about your browsing or usage habits but this information does not include personal information. We do not knowingly permit such third parties to collect any personal information from our website unless you directly provide it to us and we provide it to them with your consent.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. For more

information on the privacy practices of Google, please visit Google's Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Hotjar

Hotjar is a web analytics tool to monitor user activity on our website and improve the user experience by analyzing user trends to diagnose technical problems. Hotjar delivers deidentified or anonymous data on how users are navigating through our website via heatmaps and cookies. Hotjar does not access, harvest or sell this data. For more information, please visit <https://www.hotjar.com/legal/policies/privacy/>.

TVSquared

TVSquared is a web analytics service that tracks and reports advertisement impressions to monitor the performance of advertisements. TVSquared may place cookies on your browser and collect device IP addresses, operating system information, device type and, in the case of mobile devices, the mobile device identifier. TVSquared also collects browsing history, search history, location data and information on your interaction with our website or advertisement. Under the California Consumer Privacy Act, California residents have the right to know and delete their personal information collected by TVSquared by calling them at (212) 500-1195 or by emailing them at privacy@tvsquared.com. For more information about TVSquared's privacy policy, please visit: <https://www.tvsquared.com/privacy-policy>.

Behavioral Remarketing

We use remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

Adroll/Nextroll

Adroll/Nextroll remarketing web services are used to deliver interest-based browser and social ads to users who have visited our website. Adroll/Nextroll may place cookies on your browser in order to serve this targeted advertising. Also collected are device IP addresses, operating system information, device type and, in the case of mobile devices, the mobile device identifier. Adroll/Nextroll also collects browsing history, search history, location data and information on your interaction with our website or advertisement. Under the California Consumer Privacy Act, California residents have the right to know and delete their personal information collected by Adroll/Nextroll by calling them at (844)740-7126 or by visiting this webpage: <https://www.nextroll.com/privacy/requests>. You may also opt out of receiving Adroll/Nextroll ads by clicking on the blue icon that typically appears in the corner of their webpage and by following the instructions provided, or by visiting <https://app.adroll.com/optout>. For more information about AdRoll/Nextroll's privacy policy, please visit: <https://www.nextroll.com/privacy#service-13>.

Google AdWords

Google AdWords remarketing service is provided by Google. You can opt out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>. Google also recommends installing the Google Analytics Opt-out Browser Add-on (located at <https://tools.google.com/dlpage/gaoptout>) for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit Google's Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Facebook

Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>. To adjust Facebook's interest-based ad settings, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can opt out of Facebook and other participating companies through the Digital Advertising Alliance in the United States (<http://www.aboutads.info/choices/>), the Digital Advertising Alliance of Canada in Canada (<http://youradchoices.ca/>) or the European Interactive Digital Advertising Alliance in Europe (<http://www.youronlinechoices.eu/>), or opt out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.

Salesforce Pardot

Pardot is a marketing tool and service provided by Salesforce.com. Pardot improves the user experience on our website by using cookies and information you have submitted to us for the purpose of obtaining our financial products and services. If you have questions about your rights regarding our use of Pardot, please visit this webpage: <https://www.pardot.com/legal/permission-based-marketing-policy/>. If you wish to unsubscribe from any marketing emails sent by Guild Mortgage through Pardot, please use the Unsubscribe link at the bottom of that email or inform us in writing of your communication preferences.

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g., payment processors). We will not store or collect your payment card or banking details, unless you elect to pay using a recurring payment feature of the service. Information may be provided directly to our third-party

payment processors whose use of your personal information is governed by their respective Privacy Policy.

Links to Other Websites

Our Service may contain links to other websites or mobile applications that are not operated by us. If you click a third-party link, you will be directed to that third party's website or mobile application. We strongly advise you to review the Privacy Policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party websites, mobile applications or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes to Your Personal Data

You can access most of your personal information that we collect online and maintain by visiting your profile in the My Account section of our website. This section of the website is password-protected to better safeguard your information. As an applicant or a borrower, you can update your password, email address, mailing address, and phone number at any time on the website. As a borrower, you can also update your payment and banking information. If you need to change any other sensitive information, including but not limited to your first/last name or Social Security Number, please contact Customer Service at 1-888-699-5777.

Changes to This Privacy Policy

We may make changes to our Privacy Policy from time to time. We will notify you of any material changes by posting the new Privacy Policy to the website and updating the "effective date". You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

For California Residents Only

Effective January 1, 2020, you will have certain rights under the California Consumer Privacy Act of 2018 (the "CCPA"), California Civil Code Section 1798.100 - 1798.199. A description of these rights is provided below. These rights only apply to you if you reside in the State of California. You may only exercise these rights on or after January 1, 2020.

- You have a right to request that we disclose to you the following:
 - The categories of personal information we have collected about you in the last 12 months.
 - The categories of sources from which we have collected personal information about you in the last 12 months.
 - Our business or commercial purpose for collecting or selling personal information in the last 12 months.
 - The categories of third parties with whom we have shared personal information in the last 12 months.
 - The specific pieces of personal information that we have collected about you in the last 12 months.
- You also have a right that we disclose to you:
 - The categories of personal information that we have collected about you in the last 12 months.
 - The categories of personal information that we have sold about you in the last 12 months.
 - The categories of third parties to whom we have sold the personal information in the last 12 months.
 - The categories of personal information that we have disclosed about you for a business purpose in the last 12 months.
- You may submit a request to us for the information described above by calling (760) 505-0992 or by visiting <https://www.chatmlo.com/privacy-request/>. In order to protect your information and to verify your identity, you will be required to submit proof of identification when you make your request. You will also be required to provide your name, phone number, and email address. A mailing address will be required if you wish to receive our response via mail. Additional efforts to verify your identity may be required to prevent fraudulent activity.
- You have a right not to be discriminated against by us if you exercise any of your rights under the CCPA, including those rights described in this notice. Specifically, if you exercise any of your rights under the CCPA, (1) we will not deny goods or services to you, (2) we will not charge you different prices or rates for goods or services (including through the use of discounts or other benefits or imposing penalties); (3) we will not provide you with a different level or quality of goods or services; and (4) we will not suggest that you will receive different prices or rates for goods or services, or a different level or quality of goods or services.
- You have a right to request that we delete any personal information about you that we have collected from you (subject to the exceptions listed in California Civil Code Section 1798.105(d)(1)-(9)). If you request that we delete the personal information that we have collected about you, we will do so, and instruct any service providers of ours to do so, subject to the exceptions listed in California Civil Code Section 1798.105(d)(1)-(9). You may submit a request for deletion by calling (760) 505-0992 or by visiting <https://www.chatmlo.com/privacy-request/>. In order to protect your information and to verify your identity, you will be required to submit proof of identification when you make your request. You will also be required to provide your name, phone number, and email address. A mailing address will be required if

you wish to receive our response via mail. Additional efforts to verify your identity may be required to prevent fraudulent activity.

- You may designate a third-party agent to make a request under the CCPA on your behalf. In order to do so, the agent may submit a request by calling (760) 505-0992 or by visiting <https://www.chatmlo.com/privacy-request/>. The agent will be required to submit your proof of identification and written permission signed by you authorizing the agency to act on your behalf.

We have collected, and will collect, the following information about our California consumers over the past 12 months:

- Categories of personal information that we have collected:
 - Personal Identifiers
 - Personal Information Described in Cal. Civ. Code § 1798.80, including any information that identifies, relates to, describes, or is capable of being associated with a particular individual. This includes the person's 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. This does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.
 - Characteristics of Protected Classifications Under California or Federal Law
 - Commercial Information
 - Internet or Other Electronic Network Activity Information
 - Geolocation Data
 - Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
 - Professional or Employment-Related Information
 - Education Information
 - Inferences Drawn from Other Personal Information
- Categories of sources from which we have collected the personal information:
 - The Consumer
 - Service Providers
 - Through the Services Provided by ChatMLO
 - Publicly Available Sources
 - Other Third Parties
- We collected personal information about California consumers in the last 12 months for the following business or commercial purposes:
 - Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of ChatMLO, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of ChatMLO
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.
- We have shared personal information about California consumers with the following categories of third parties in the last 12 months:
 - Service Providers
 - Affiliated Financial Companies
 - Affiliated Nonfinancial Companies
 - Nonaffiliated Direct Marketing Companies
 - Nonaffiliated Joint Marketing Partners

We will not collect additional categories of personal information or use personal information collected for additional purposes without notifying you. To the extent information is governed by the CCPA, we have not sold, and do not sell, personal information about California consumers.

- We have disclosed the following categories of personal information to third parties for a business purpose:
 - Personal Identifiers
 - Personal Information Described in Cal. Civ. Code § 1798.80, including any information that identifies, relates to, describes, or is capable of being associated with, a particular individual. This includes the person's 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. This does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

- Characteristics of Protected Classifications Under California or Federal Law
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-Related Information
- Education Information
- Inferences Drawn from Other Personal Information
- We have disclosed consumers' personal information to the following categories of third in the last 12 months:
 - Service Providers
 - Affiliated Financial Companies
 - Affiliated Nonfinancial Companies
 - Nonaffiliated Direct Marketing Companies
 - Nonaffiliated Joint Marketing Partners

Contact Us

For questions or concerns regarding ChatMLO's privacy policies and practices, you may email us at support@chatmlo.com, call us at 760-505-0992 or write us at ChatMLO, Attn: Legal Department, 1084 N. El Camino Real #171, Encinitas CA 92024.