

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE - CONSUMERS

LERETA, LLC (“LERETA”, “we” or “us”) is an industry leading real estate tax and flood determination service provider to lenders and mortgage servicers of residential and commercial loans. We provide business to business products and services and do not offer products or services directly to consumers. The privacy notices of your lender or mortgage servicer applies to you and you should refer to those privacy notices and/or contact your lender or mortgage servicer to understand how your Personal Information will be used by them. This Privacy Notice explains how we collect, use, share and protect personal information we process on California residents as a service provider under the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”).

This Privacy Notice applies solely to all visitors to and users of our website, customers, and others who reside in the State of California (“consumers” or “you”). This Privacy Notice does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or other similar individuals (“HR Information Subjects”). For more information on how we handle the Personal Information of HR Information Subjects, please see the section titled “HR Information Subjects” below.

Personal Information Collected by Us as a Service Provider

When we collect or receive and process Personal Information about consumers (information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household), we do so as a service provider solely to provide our services to lending institutions and mortgage service providers.

Under the CCPA, Personal Information does not include:

- Publicly available information from federal, state, and local government records
- De-identified or aggregated consumer information.
- Information excluded from the scope of the CCPA, such as personal information covered by certain sector specific privacy laws such as the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.

The categories of Personal Information we have collected in the last 12 months is:

Category of Personal Information	Examples	Sources of Information
Identifiers	First and last name, postal or property	<ul style="list-style-type: none">● Directly from you.

	<p>address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> • From publicly available sources, such as public records maintained by federal, state, or local governmental entities. This includes information such as real property ownership, tax assessments, and assessed property values. • Your lending institution or mortgage servicer when they provide us with the information that they collected from you. We receive only that information which is necessary for us to provide our services to them. • Any unaffiliated third party or service provider we engage to assist us in performing services for lending institutions and mortgage service providers. such as parcel or property information base aggregators.
<p>Personal Information under California Civil Code Section 1798.80(e)</p>	<p>Name, signature, address, telephone number, postal or property address, loan number and financial account information such as your outstanding mortgage loan balance and other information described under this law.</p> <p>Note that some Personal Information described in this category overlaps with other categories.</p>	<ul style="list-style-type: none"> • Directly from you. • From publicly available sources, such as public records maintained by federal, state, or local governmental entities. This includes information such as real property ownership, tax assessments, and assessed property values. • Your lending institution or mortgage servicer when they provide us with the information that they collected from you. We receive only that information which is necessary for us to provide our services to them. • Any unaffiliated third party or service provider we engage to assist us in performing services for lending institutions and mortgage service providers. such as parcel or property information base aggregators.
<p>Protected Classification Characteristics</p>	<p>Age (40 years or older), race, color, ancestry, national origin,</p>	<p>We do not collect this information regarding consumers.</p>

	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).	
Commercial Information	Records of products or services purchased or considered, or other purchasing history or tendencies.	We do not collect this information regarding consumers.
Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or other activity patterns used to extract a template or other identifier such as fingerprints.	We do not collect this information regarding consumers.
Internet or Other Similar Network Activity	Browsing history, search history, information on a consumer's interaction with our information systems.	<ul style="list-style-type: none"> • Indirectly from you, such as through automated collection technologies. • From service providers or contractors, such as third party analytics providers, our website host, and others involved in the management, operation, and analysis of our website and visitor information.
Geolocation Information	Physical location or movements.	We do not collect this information regarding consumers.
Sensory Information	Audio, electronic, visual, thermal, olfactory, or similar information.	We may collect audio information if you call our customer service line.

Professional or Employment-Related Information	Current or past job history or performance evaluations.	We do not collect this information regarding consumers.
Non-Public Education Information	Education records related to a student maintained by an educational institution or a party action on its behalf, such as grades, transcripts, class lists, schedules, financial information, or disciplinary records.	We do not collect this information regarding consumers.
Inferences	Profile information reflecting a consumer's preferences, characteristics, behavior, attitudes, or other similar information.	We do not collect this information regarding consumers.
Sensitive Personal Information	Social Security Number, driver's license, state identification card, or passport number, racial or ethnic origin, union membership, information related to a consumer's citizenship or immigration status.	We do not require or use Sensitive Personal Information from our lending institution and mortgage servicer clients in order to provide our real estate tax and flood determination services to them. We do not use these types of personal information to develop inferences regarding you and, as such, do not collect Sensitive Personal Information as defined under California law.

This Personal Information is Collected for the Following Business Purposes

When we collect or receive and process Personal Information about consumers, we do so as a service provider solely to provide our services to lending institutions and mortgage service providers. As a service provider, we collect and use or may collect and use such Personal Information:

- To carry out our contractual obligation to provide services to your lending institution or mortgage service provider
- To provide your lending institution or mortgage service provider with reporting on our performance

- To provide certain call center services to lending institutions and mortgage service providers
- For authentication purposes when you call us for customer support
- To provide you with support and to respond to your inquiries, questions or other requests, including to investigate and address your concerns and monitor and improve our responses
- To comply with legal obligations
- To protect against deceptive, fraudulent or illegal activity
- To detect, prevent and respond to security incidents and 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
- For quality monitoring and to comply with our contractual obligations to your lending institution or mortgage service provider, we may keep a record of any telephone conversation of yours with us
- If Browsing Information is collected, it is collected to better serve you if you visit our website, save you time if you visit our website and to provide you with a more meaningful and productive website experience
- 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
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations

Categories of Third Parties with Whom We Share such Personal Information

When we collect or receive and process Personal Information about consumers, we do so as a service provider solely to provide our services to lending institutions and mortgage service providers.

We may disclose your Personal Information to a third party for a business purpose, specifically to enable and support the uses of your Personal Information described in the section above labelled “**This Personal Information is Collected for the Following Business Purposes.**”

In the prior 12 months, LERETA has disclosed for a business purpose and/or sold Personal Information to the categories of third parties indicated in the chart below.

Category of Personal Information	Category of Third-Party Recipients	
	<i>Business Purpose Disclosures</i>	<i>Sales</i>

<p>Identifiers</p>	<ul style="list-style-type: none">● The lending institutions and mortgage servicers with whom we contracted to provide services● Unaffiliated third parties with whom we contract to assist us in performing services for our lending institution and mortgage servicer clients. These third parties cannot use the Personal Information for their own purposes, are authorized to use your Personal Information only as necessary to provide services to us and are subject to appropriate confidentiality obligations.● Unaffiliated third parties providing services to government agencies or as may be necessary for us to provide the services your lending institution or mortgage servicer has requested of us● To satisfy or comply with applicable laws or regulations● To establish or exercise our rights or defend legal claims● Our auditors● Government agencies, such as tax assessors, in connection with performing our services	<p>We do not sell this information.</p>
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	<p>on behalf of lending institutions and mortgage servicers.</p> <ul style="list-style-type: none"> • As directed by our lending institution or mortgage servicer client • Other parties to whom you or your authorized agent give consent to us to share your Personal Information 	
<p>Personal Information under California Civil Code Section 1798.80(e)</p>	<ul style="list-style-type: none"> • The lending institutions and mortgage servicers with whom we contracted to provide services • Unaffiliated third parties with whom we contract to assist us in performing services for our lending institution and mortgage servicer clients. These third parties cannot use the Personal Information for their own purposes, are authorized to use your Personal Information only as necessary to provide services to us and are subject to appropriate confidentiality obligations. • Unaffiliated third parties providing services to government agencies or as may be necessary for us to provide the services your lending institution or mortgage servicer has requested of us 	<p>We do not sell this information.</p>

	<ul style="list-style-type: none"> ● Law enforcement or other governmental authorities in connection with an investigation ● In response to legal process, civil or criminal subpoenas, court orders, or discovery ● To satisfy or comply with applicable laws or regulations ● To establish or exercise our rights or defend legal claims ● Our auditors ● Government agencies, such as tax assessors, in connection with performing our services on behalf of lending institutions and mortgage servicers. ● As directed by our lending institution or mortgage servicer client. ● Other parties to whom you or your authorized agent give consent to us to share your Personal Information. 	
Protected Classification Characteristics	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Commercial Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Biometric Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Internet or Other Similar Network Activity	We do not disclose this information.	We do not sell this information.

Geolocation Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Sensory Information	<ul style="list-style-type: none"> The lending institutions and mortgage servicers with whom we contracted to provide services. 	We do not sell this information.
Professional or Employment-Related Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Non-Public Education Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Inferences	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.
Sensitive Personal Information	We do not collect this information regarding consumers.	We do not collect this information regarding consumers.

We reserve the right to share your Personal Information in connection with the potential sale or other disposition of our business or with potential third-party investors in us.

The privacy notices of your lending institution or mortgage servicer shall apply to you and you should refer to those privacy notices and/or contact your lending institution or mortgage servicer to understand how your Personal Information is collected, shared and used by them.

Sale of Personal Information

LERETA does not sell (as that term is defined by the CCPA) Personal Information in exchange for monetary compensation or other valuable consideration. We have not sold Personal Information in the last 12 months. We have also not sold any browsing information in the past 12 months. LERETA does not share Personal Information for cross-contextual behavioral advertising purposes. Cross-context behavioral advertising is “the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally interacts.”

Personal Information of Minors

We do not offer services to children. Our website is not intended for children under the age of 16 and we request that individuals under the age of 16 do not submit any personal information on the website. LERETA does not intentionally or knowingly collect Personal Information from any person we know to be under the age of sixteen (16) without permission from a parent or legal guardian. If we obtain actual knowledge that we have received such information, we will use commercially reasonable steps to delete it.

Right to Request to Know and Access Personal Information Collected or Disclosed

The CCPA provides California consumers with the right to know and request access to a copy of the Personal Information a business collects, uses, discloses, and sells and how to exercise those rights. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your consumer request rights as they are responsible for complying with such request related to your Personal Information.

Right to Request Deletion of Personal Information

The CCPA provides California consumers with the right to request that their Personal Information be deleted. As a service provider we cannot act on any request you make directly to us to delete any of your Personal Information since retaining that information is necessary for us to fulfill the services we provide to your lending institution or mortgage servicer. Your lending institution or mortgage servicer, not us, is the owner and controller of your Personal Information and you should contact them directly if you wish to have your Personal Information deleted as they are responsible for taking action on a consumer request to delete Personal Information. In the event deletion is necessary, your lending institution or mortgage servicer will communicate that request to us so that we may update our records.

Right to Rectification (Correct Your Personal Information)

The CCPA provides California consumers with the right to request that Personal Information be modified or rectified if it is inaccurate. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your right to request a correction to your Personal Information as they are responsible for complying with such request.

Right to Opt-Out of the Sale or Sharing of Personal Information

The CCPA grants California consumers the right to opt-out of the sale or sharing of Personal Information with third parties. LERETA does not sell consumer Personal Information for monetary or other consideration to any third parties. Additionally, LERETA does not share consumer Personal Information with third parties. “Sharing” is defined under the CCPA as “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising.” As such, this right does not apply.

Right to Request the Limitation of the Use and Disclosure of Sensitive Personal Information

The CCPA grants California consumers the right to request the limitation of the use and disclosure of Sensitive Personal Information. Although LERETA, in its capacity as a service provider for another business, may collect information that would otherwise be considered Sensitive Personal Information, we do not use it to infer characteristics about consumers. As such, the CCPA, as modified by the CPRA, treats this information only as Personal Information and this right does not apply.

Right to Opt-In to the Sale or Sharing of Personal Information

The CCPA grants California consumers the right to opt back into the sale or sharing of their Personal Information if they have previously opted-out of either or both of those processing activities. Because LERETA does not sell or share the Personal Information of consumers and the right to opt-out does not apply, the right to opt-in also does not apply.

Right to Non-Discrimination

California consumers have a right not to be discriminated against by exercising their consumer privacy rights. We will not discriminate against you for exercising any of your CCPA rights.

Right to Use an Authorized Agent

California consumers may use an authorized agent to submit a request to know or a request to delete their information. Because we collect and process Personal Information about consumers as a service provider for another business, that business, not us, is the owner and controller of the Personal Information. You should contact your lending institution or mortgage servicer to exercise your right to designate an authorized agent and to understand any requirements they may impose before allowing an authorized agent to act on your behalf as they are responsible for complying with consumer request rights related to such Personal Information.

Contact Information

If you have any questions or concerns regarding this CCPA Privacy Notice and the ways in which we collect, use, and disclose your Personal Information, please do not hesitate to contact us by calling us Toll Free at 833-760-0290.

Retention of Personal Information

We generally retain information on the services we provide regarding a property owner's real estate property taxes or flood determinations for at least 10 years from the date of our last interaction, in compliance with our obligations under applicable laws, or for longer if required to do so according to our regulatory obligations, client requirements, or where we believe necessary to resolve disputes, establish, defend or protect our legal rights or those of others or to protect against fraudulent, deceptive or illegal activity or for another one of our business purposes.

Security

We are committed to protecting the Personal Information of our client's customers. We implement physical, administrative and technical safeguards reasonably designed to help us protect against unauthorized access, use and disclosure of such Personal Information. We also require our unaffiliated third-party service providers to protect such Personal Information from unauthorized access, use and disclosure. We encrypt Personal Information when we transmit such information over the Internet. We also take reasonable steps to prevent and detect unauthorized intrusions into our systems.

HR Information Subjects

We collect personal information concerning our current and former employees as well as certain others such as consumers, agency temps, and independent contractors ("HR Information Subjects"). HR Information Subjects should refer to the privacy statements available on LERETA's Intranet or Career Website for information on the collection and processing of their Personal Information in relation to their role with LERETA.

Changes to Our CCPA Privacy Notice

We reserve the right to amend this CCPA Privacy Notice in our sole discretion at any time. When we make changes to this CCPA Privacy Notice, we will post the updated CCPA Privacy Notice on our website and update its effective date.

This CCPA Privacy Notice was last updated on February 17, 2023.