

Easy First Home Loans LLC

Privacy and Data Handling Policy

UPDATED AS OF May 28, 2024

1. Consumer Privacy Notice

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income.
- Account balances and payment history.
- Credit History and credit scores.
- Demographic data, when required by federal law

When you are no longer our customer, we continue to share your information as described in this notice.

All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons the Agency chooses to share; and whether you can limit this sharing.

2. When and Why We Share Personal Information

Reasons we can share your personal information	Does the company share?	Can you limit this sharing?
1. For our everyday purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, comply with federal law, or report to credit bureaus.	Yes	No

2. For our marketing purposes-	No	We do not share
such as to offer our products and services to you		
3. For joint marketing with other financial companies	No	We do not share
4. For our affiliates everyday purposes	No	We do not share
5. For our affiliates to market to you	No	We do not share
6. For non-affiliates to market to you	No	We do not share

3. How we collect your personal information

a. Online contact forms and applications

When visiting our site, easyfirsthomeloans.com or any other site owned and operated by Easy First Home Loans LLC, certain information may be collected automatically by us including your device ID, IP address, time of visit, and other non-personal tracking information we use to monitor and improve site performance.

You may choose to submit to us a contact form, in which we may ask for your name, telephone number, product or service of interest, and a free form text for additional comments or questions. Contact data is reserved on site servers only until reviewed by us. From there, this data is used within 30 days to establish contact with you for the purposes of satisfying your request. If, after 30 days, we have been unable to establish contact with you and or a client relationship is not established (i.e. you choose not to apply for or proceed with a loan) your personal information will be deleted from our digital records and any paper records containing your personal information will be securely destroyed except where we are required to retain it to comply with applicable law.

You may choose to submit an application, in which we may ask for your name, date of birth, identifying number (SSN, TIN, EIN), address, product or service of interest, purpose of loan, and other information which assists us in verifying your identity and processing your application in accordance with federal law. Additional information or documents may be requested. When you submit an application online, the data is stored on our secure servers until processed by us. Once processed, data is

removed from our servers and is securely stored locally in either digital or physical records for the appropriate timeframes according to federal law. We reserve the right to market our products and services to prior applicants for a period of 18 months from our last date of contact with the applicant.

b. Telephone, E-mail, and Text Message Communications

We may contact you or be contacted by you by phone via call or text message at any time during normal business hours except where prohibited by law. When we communicate with you using any of these methods, we may collect and store information you provide using digital or handwritten notes and forms. We may complete an application verbally using the Uniform Residential Loan Application (form 1003). We will provide a copy of our consumer privacy notice by E-mail at the time of any over the phone application.

Your information will be stored securely as a part of a physical and or digital file relating to your request. This information will be used only for the purposes of completing your request and for us to market our products and services to you.

We may record telephone conversations for the purposes of maintaining quality control, and providing training for new loan officers. You will be either notified at the onset of the call that it is being recorded, or asked permission to record before recording begins. We are not required by law to ask permission to record, but have provided for this practice in this policy because we value our prospective client's rights to privacy.

All telephone communications are subject to and will comply with the FTC Do Not Call Rule.

c. In Person Meetings

When meeting in person, we may record any information you provide for the purposes of conducting our business and completing your request. we may collect and store information you provide using digital or handwritten notes and forms. We may complete an application using the Uniform Residential Loan Application (form 1003) and will provide a copy of our consumer privacy notice at that time.

d. Consumer Reporting Agencies

During the course of conducting our business as mortgage brokers, we may obtain and use information obtained from consumer reporting agencies. We use Experian to access a Tri-Merge credit report which will appear as a hard inquiry for a mortgage application on each of the applicants 3 major credit reports. We will obtain the credit report and score of an applicant only with their expressed permission and request to apply for a loan. The information obtained will be used only for the expressed

purpose of attempting to secure a residential mortgage loan or line of credit per the request of the client or client's whose reports are accessed.

4. How We Store Your Personal Information

a. Digital Records

Digital records may be understood to include any data which is collected and stored using our computers and web servers.

Non-identifying personal information, such as device ID or and tracking data may be stored indefinitely on our web servers. This data will not be linked with any personal information provided which is subject to greater security and specific timelines of retention.

Non public personal information will be exported from the web servers immediately upon us processing the data, no more than 3 business days after receiving it. After being exported, digital records of NPPI will be kept on local hard drives during an active application and retained on network isolated hard drives after a loan decision or loan closing for the times required by federal law.

b. Physical Records

During the course of our business with you certain physical records about you and your transaction may be generated or provided to us by you. These physical records will be stored securely in locked filing cabinets accessible only to those with a permissible business purpose to access them in accordance with applicable law.

We may retain some non-identifying information about your transaction indefinitely for internal tracking and planning purposes.

5. How We Dispose of Your Personal Information

Any record for which a prescribed timeline of retention is provided for by this policy or by federal law will be disposed of securely and completely at the given time. For digital records, this means deletion in their entirety from all storage devices. For physical records, this means they will be either shredded or redacted to effectively destroy all personally identifying elements. Shredded documents will be burned monthly to prevent reconstruction of private client data.