

# California Disclosures and Privacy Policy

**Effective Date:** January 1, 2023

This **Privacy Notice for California Residents** supplements the information contained in the Privacy Statement of OPPORTUNITY FINANCIAL, LLC and its subsidiaries ("Opportunity Financial", "OppLoans," "we," "us," or "our") and solely to individuals that reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), California Privacy Rights Act ("CPRA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect About You

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 or household ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, including :
  - 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.

In particular, we have collected the following categories of personal information from consumers:

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	A name, signature, Social Security number, physical characteristics or description, address,	YES

Category	Examples	Collected
California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	
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.	Activity patterns such as keystroke	YES
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. Professional or employment-related information.	Current or past job history or performance evaluations.	YES

Category	Examples	Collected
I. Sensitive Personal Information	Social Security number, driver's license, state identification, passport, consumer's financial account log-in or card number in combination with security or password credentials, precise geolocation, race or ethnic origins.	YES

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

- Directly from you or your authorized agents. For example, from forms you complete on your application or through information you provide us during the life of your loan.
- Indirectly from you. For example, from observing your actions on our website ([www.opploans.com](http://www.opploans.com)).
- From third-parties that interact with us in connection with the origination or servicing of your loan. For example, from credit bureaus, affiliates, or other companies.
- Public Record Sources

## Business Purpose for Collection

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a loan or ask a question about our products or services, we will use that personal information to respond to your application or inquiry. If you provide your personal information to receive a loan from us or a loan serviced by us, we will use that information to facilitate delivery of your funds and process payments. We may also save your information to facilitate new products for you.
- To administer, operate, facilitate, and manage your relationship and/or account with Opportunity Financial. This may include sharing such information internally as well as disclosing it to our third-party service providers.
- To evaluate your eligibility for products provided by or through Opportunity Financial.
- To perform services on behalf of a CCPA covered business or its service provider, such as customer service, payment processing, financing, advertising, marketing, or analytic services.
- 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, transactions, and payments and to 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 the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as 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.

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.

## Sharing Personal Information

We may disclose your personal information to a third party for a business purpose or sell your personal information, subject to your right to opt-out of those sales. 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.

We share your personal information with the following categories of third parties:

- Service Providers and Contractors
- Affiliates
- Partners
- Parent or subsidiary organizations
- Internet cookie data recipients, like Google Analytics
- Government Agencies as required by laws, regulations, and licensing requirements
- Other persons or entities with which you may use or direct us to intentionally interact or disclose your Personal Information

We do not disclose Personal Information to any other category of third parties.

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

Category A: Identifiers.

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. § 1798.80(e)).

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial Information.

Category E: Biometric Information

Category F: Internet or other similar network activity.

Category G: Geolocation Data

Category H: Professional or employment-related information.

Category I: Sensitive Personal Information

In the proceeding twelve (12) months, we have sold the following categories of personal information:

Category A: Identifiers

Category B: Personal information categories listed in California Customer Records statutes (Cal. Civ. § 1798.80(e)).

With respect to each category or Personal Information that we disclosed for a business purpose in the past 12 months, the categories of persons or entities to whom we disclosed that Personal Information are:

- Affiliates, subsidiaries, and parent companies of OppLoans.
- Service Providers and Contractors who provide us with services such as website hosting, payment processing, email delivery, auditing, marketing, credit financing, event management, legal expertise, tax expertise, customer service, data analytics, critical technology and related infrastructure, email delivery, marketing, marketing research, services that assist with online transactions, mobile devices, financial services and products, and communications.
- To persons or entities as necessary to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as going concern or as part of bankruptcy, liquidation, or similar proceeding.

- Government Agencies as required by laws, regulations, and licensing requirements.
- Other persons or entities with which you may use or direct us to intentionally interact or to which you may use us or direct us to intentionally disclose your personal information.

## Sensitive Personal Information

OppLoans collects Personal Information that fits within the category of Sensitive Personal Information where required by applicable law, when necessary to exercise or defend legal claims, as necessary for legal regulatory reasons, and where the consumer has provided explicit consent.

Subject to applicable laws, OppLoans may process Sensitive Personal Information for the following business purposes:

- To perform the services or provide goods reasonably expected when the information was provided. For example, we might use your social security number or driver's license to verify your identity.
- To perform services such as maintaining or servicing your account, providing customer service, processing transactions, verifying your information, processing payments, analytic services.
- To detect security incidents, detect and monitor malicious, deceptive, fraudulent, and illegal actions.

### Use of Personal Information

OppLoans collects the following specific pieces of Personal Information as needed to maintain the business and provide services:

- Name, alias, unique personal identifier, online identifier, internet protocol address, email address, postal address, telephone number.
- Social security number, driver's license, state or federal identification or other similar identifiers.
- Financial information such as bank account number, credit or debit card number.
- Education, employment, employment history including job references.
- Date of birth/age, race, citizenship, marital status, sex, and keystroke patterns.
- Browsing and search history, physical location.
- Professional or employment related information

We retain each category of Personal Information based on the following criteria:

- Applicable federal, state, and local laws and regulatory data retention requirements. The records could be kept longer if there is a legal hold placed on the file.

- Length of time necessary in order to accomplish the business purpose for which the Personal Information is collected, used, or disclosed.
- Whether you exercise your right, subject to exemptions, to delete your Personal Information.

## Your Rights and Choices

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

### ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS.

You have the right to request that we disclose certain information to you about our collection and use of your personal information. 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 sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  1. sales, identifying the personal information categories that each category of recipient purchased; and
  2. disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We may deny your request for access if we are unable to verify your identity or have reason to believe that the request is fraudulent.

### DELETION REQUEST RIGHTS.

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. 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 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.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We may deny your request for access if we are unable to verify your identity or have reason to believe that the request is fraudulent.

## EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS.

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

- Calling us at (877) 272-0690
- Visiting [privacy.opploans.com](https://privacy.opploans.com)

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. To designate an authorized agent, you or the authorized agent must provide written permission that the agent is authorized to make the request. We will then verify the authorized agent's own identity.

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, which may include:
  - Information that matches data points of information that we currently hold.
  - Further, we may require a signed declaration under penalty of perjury from you stating that you are whose personal information is the subject of the request. We will then retain the signed declaration as part of our recordkeeping obligations under the CCPA.

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 that relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instruction on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

## 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 mail or electronically, at your option.

Any disclosures we provide will only cover data as far back as January 1, 2022. 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 usable and should allow you to transmit the information from one entity to another entity without hindrance, specifically we will provide your response in machine readable format.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, 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.

## PERSONAL INFORMATION SALES OPT-OUT AND OPT-IN RIGHTS.

We do not knowingly collect the Personal Information of anyone under the age of 16. We do not sell the personal information of consumers we actually know are less than 16 years of age .

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

## Do Not Sell My Personal Information

You do not need to create an account with us to exercise your opt-out rights. We will use personal information provided in an opt-out request to review and comply with the request. You can do so by [clicking here](#).

## Opt In

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt into personal information sales at any time.

## 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.
- 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.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which may revoke at any time.

## 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 an updated notice on our 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 we collect and use your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** (877) 272-0690

**Website:** [privacy.opploans.com](https://privacy.opploans.com)

**Address:** Opportunity Financial, LLC

130 E. Randolph St., Ste. 3400

Chicago, IL 60601

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**Last Reviewed On:** January 1, 2023

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