



Effective Date: January 1, 2023

Last Reviewed/Revised on: January 1, 2023

## Notice at Collection and Privacy Policy for California Residents

This California Notice at Collection and Privacy Policy (“CCPA Disclosure”) explains how Selene Finance, LLP and its subsidiaries and affiliates (“Company”, “us”, “our”, or “we”) collect, use, disclose and/or retain personal information (“Information Practices”) subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”). This CCPA Disclosure applies solely to California residents (“consumers” or “you”).

The CCPA does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, and certain other state or federal privacy laws. For example, this CCPA Disclosure does not apply to information that we collect about individuals who seek, apply for, or obtain our financial products and services for personal, family, or household purposes, which is subject to our California [Financial Privacy Notice](#), or other financial privacy notice applicable to our services.

This CCPA Disclosure does not apply to information we collect in the context of an individual’s interaction with us as a job applicant, employee, contractor, or in an employment related context. Please refer to our [Employee CCPA Notice at Collection Privacy Policy](#).

### NOTICE AT COLLECTION

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used. Please note that most of the information we use is in the context of providing financial products and services for personal, family, or household purposes and is therefore not subject to the CCPA.

#### General Personal Information

Do We collect?	Categories of Personal Information	Purposes for Collection and Use
<input checked="" type="checkbox"/>	<b>Identifiers:</b> For example, a name, address, Internet Protocol address, email address, or other similar identifiers.	<ul style="list-style-type: none"> <li>• To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> <li>• To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> </ul>
<input checked="" type="checkbox"/>	<b>Personal Information Categories from Cal. Civ. Code § 1798.80(e):</b> For example, a name, signature, Social Security number, telephone number,	<ul style="list-style-type: none"> <li>• To service your account and provide you with support, such as customer service or payment processing</li> </ul>

	state for federal identification, financial information.	<ul style="list-style-type: none"> <li>To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> <li>For web-based analytics, research to understand our customer base, marketing, and advertising</li> <li>To conduct business with you or your employer in your role with a third party that we do business with</li> <li>To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights</li> <li>To share the personal information with service providers to carry out other business purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Characteristics of CA or Federal Protected Classifications:</b> For example, race, religion, national origin, age, gender, sexual orientation, medical condition, or veteran status.	<ul style="list-style-type: none"> <li>To conduct business with you or your employer in your role with a third party that we do business with</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> <li>To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Commercial Information:</b> For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> <li>Verify, maintain, or improve the quality or safety of the services and products we provide</li> <li>To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Internet or Other Similar Network Activity:</b> For example, browsing history, search history, and information regarding a consumer's	<ul style="list-style-type: none"> <li>For web-based analytics, research to understand our customer base, marketing, and advertising</li> </ul>

	interaction with an Internet Web site, application, or advertisement.	<ul style="list-style-type: none"> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Geolocation Data:</b> For example, a device's physical location.	<ul style="list-style-type: none"> <li>To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> <li>For web-based analytics, research to understand our customer base, marketing, and advertising</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Sensory or Surveillance Data:</b> For example, call recordings or other audio, electronic, or visual monitoring or surveillance.	<ul style="list-style-type: none"> <li>To service your account and provide you with support, such as customer service or payment processing</li> <li>To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> </ul>
<input checked="" type="checkbox"/>	<b>Professional or Employment-Related Information:</b> For example, information relating to your current or former employment.	<ul style="list-style-type: none"> <li>To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> <li>To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> <li>To conduct business with you or your employer in your role with a third party that we do business with</li> </ul>

**We do not collect:** biometric information, education information (as defined in the Family Education Rights and Privacy Act), or profile data.

**Sensitive Personal Information**

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

Categories of Sensitive Personal Information	Purposes for Collection and Use
Social Security Number, Driver’s License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> <li>• To perform services or provide goods you request and reasonably expect from us</li> <li>• To detect, prevent, and investigate security incidents involving your information</li> <li>• To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> </ul> <p>To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</p> <ul style="list-style-type: none"> <li>• To ensure the safety of you and others</li> </ul> <p>To ensure the quality or safety of a product, service, or device</p> <ul style="list-style-type: none"> <li>• To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided</li> </ul>
Account log-in or financial account when provided with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> <li>• To perform services or provide goods you request and reasonably expect from us</li> <li>• To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>• To detect, prevent, and investigate security incidents involving your information</li> <li>• To ensure the quality or safety of a product, service, or device</li> <li>• To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</li> <li>• To enhance your experience on our website in real time, so long as we do not disclose your information to a third party</li> </ul>
Racial or ethnic origin	<ul style="list-style-type: none"> <li>• To conduct business with you or your employer in your role with a third party that we do business with</li> </ul>

	<ul style="list-style-type: none"> <li>• In accordance with applicable law and investor guidelines</li> </ul>
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**We do not collect:** precise geolocation; contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication); genetic data; biometric information for the purpose of unique identification; health information; information concerning sex life or sexual orientation.

**Retention Periods**

We retain information for different periods of time depending on the purposes for which we collect and use it, which may be up to ten years after we no longer service your account or provide or other services. For example, if you have a commercial loan with us, we will retain your information for the life of the loan, plus any applicable legal requirements.

We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above, unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing your information.

**We do not sell your personal information or share your personal information for the purposes of cross-context behavioral advertising. As a result, we do not offer a right to opt-out of selling or sharing.**

Please review our California Privacy Policy below.

**PRIVACY POLICY**

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our collection, use, disclosure, and/or retention personal information (“Information Practices”). You have certain rights to control the use of your personal information. This privacy policy describes your rights as it relates to our Information Practices and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about consumers, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

**General Personal Information**

<b>Category</b>	<b>In the preceding 12 months this category was:</b>	<b>Business or Commercial Purpose for Collection &amp; Disclosure</b>	<b>Categories of third parties to whom the information was disclosed</b>
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	Collected	Disclosed		
<b>Identifiers</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> <li>To service your account and provide you with support, such as customer service or payment processing</li> <li>To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> <li>For web-based analytics, research to understand our customer base, marketing, and advertising</li> </ul>	<ul style="list-style-type: none"> <li>Transactional service providers such as payment processors</li> <li>Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> <li>Analytics and research service providers such as data analytics providers</li> <li>Pursuant to legal process or with government entities</li> <li>Social networks</li> <li>Customer Service or Help Desk service providers</li> <li>Security and cybersecurity service providers</li> <li>Advertising networks</li> <li>Credit Reporting Agencies</li> <li>Mortgage servicing vendors: <ul style="list-style-type: none"> <li>Property inspections</li> <li>Property preservation</li> <li>Valuations</li> <li>Title services</li> <li>Loss mitigation</li> </ul> </li> </ul>
<b>Personal Information Categories from Cal. Civ. Code § 1798.80(e)</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<b>Characteristics of CA or Federal Protected Classifications</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>To conduct business with you or your employer in your role with a third party that we do business with</li> <li>To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights</li> </ul>	<ul style="list-style-type: none"> <li>Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> <li>Pursuant to legal process or with government entities</li> <li>Customer Service or Help Desk service providers</li> <li>Credit Reporting Agencies</li> <li>Mortgage servicing vendors: <ul style="list-style-type: none"> <li>Property inspections</li> <li>Property preservation</li> <li>Valuations</li> <li>Title services</li> <li>Loss mitigation</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>• To combat fraud and loss and to protect the physical safety of our customers and employees</li> <li>• To perform quality assurance and control for our business and to protect the integrity and security of our systems</li> <li>• To carry out other business purposes, including engaging vendors and service providers to provide additional services necessary for our business functions</li> </ul>	
<b>Commercial Information</b>	☒	☒	<ul style="list-style-type: none"> <li>• Verify, maintain, or improve the quality or safety of the services and products we provide</li> <li>• To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> </ul>	<ul style="list-style-type: none"> <li>• Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> <li>• Pursuant to legal process or with government entities</li> <li>• Customer Service or Help Desk service providers</li> <li>• Credit Reporting Agencies</li> <li>• Mortgage servicing vendors: <ul style="list-style-type: none"> <li>○ Property inspections</li> <li>○ Property preservation</li> <li>○ Valuations</li> <li>○ Title services</li> <li>○ Loss mitigation</li> </ul> </li> </ul>
<b>Internet or Other Similar Network Activity</b>	☒	☒	<ul style="list-style-type: none"> <li>• For web-based analytics, research to understand our customer base, marketing, and advertising</li> </ul>	<ul style="list-style-type: none"> <li>• Analytics and research service providers such as data analytics providers</li> <li>• Security and cybersecurity service providers</li> </ul>

<b>Geolocation Data</b>	☒	☒	<ul style="list-style-type: none"> <li>• To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Transactional service providers such as payment processors</li> <li>• Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> <li>• Security and cybersecurity service providers</li> </ul>
<b>Sensory or Surveillance Data</b>	☒	☒	<ul style="list-style-type: none"> <li>• To service your account and provide you with support, such as customer service or payment processing</li> <li>• To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Service or Help Desk service providers</li> <li>• Security and cybersecurity service providers</li> <li>• Transactional service providers such as payment processors</li> <li>• Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> </ul>
<b>Professional or Employment-Related Information</b>	☒	☒	<p>To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</p> <ul style="list-style-type: none"> <li>• To fulfill or meet the reason for which the information is provided or for our internal operation purposes</li> <li>• To conduct business with you or your employer in your role with a third party that we do business with</li> </ul>	<ul style="list-style-type: none"> <li>• Operational service providers such as financial accounting, internet service, cloud storage, web hosting, or email distribution providers</li> <li>• Mortgage servicing vendors: <ul style="list-style-type: none"> <li>○ Property inspections</li> <li>○ Property preservation</li> <li>○ Valuations</li> <li>○ Title services</li> <li>○ Loss mitigation</li> </ul> </li> </ul>

**We do not collect:** biometric information, education information (as defined in the Family Education Rights and Privacy Act), or profile data.



**Sensitive Personal Information**

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

Category	In the preceding 12 months this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
	Collected	Disclosed		
<b>Social Security Number, Driver's License, State Identification Card, or Passport Number</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• To provide or collect on a commercial, investment, or non-personal, family, or household financial product or service</li> <li>• To service your account and provide you with support, such as customer service or payment processing</li> <li>• To verify your identity, fraud and security detection, debugging, or short-term data use for the current transaction</li> <li>• For web-based analytics, research to understand our customer base, marketing, and advertising</li> <li>• To conduct business with you or your employer in your role with a third party that we do business with</li> </ul>	<ul style="list-style-type: none"> <li>• Government entities</li> <li>• Operating systems and platforms</li> <li>• Credit Reporting Agencies</li> <li>• Vendors providing the following services:               <ul style="list-style-type: none"> <li>○ Cloud storage</li> <li>○ Payment processing</li> <li>○ Web hosting</li> <li>○ Accounting</li> <li>○ Cybersecurity</li> <li>○ Logistics and planning tools</li> <li>○ Customer relationship management tools</li> <li>○ Property inspections</li> <li>○ Valuations</li> <li>○ Title services</li> <li>○ Loss mitigation</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>• To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights</li> <li>• To combat fraud and loss and to protect the physical safety of our customers and employees</li> <li>• To perform quality assurance and control for our business and to protect the integrity and security of our systems</li> <li>• To carry out other business purposes, including engaging vendors and service providers to provide additional services necessary for our business functions</li> </ul>	
<p><b>Account log-in, financial account, password, or credentials allowing access to an account</b></p>	☒	☒	<ul style="list-style-type: none"> <li>• To perform services or provide goods you request and reasonably expect from us</li> <li>• To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> </ul>	

			<ul style="list-style-type: none"> <li>• To detect, prevent, and investigate security incidents involving your information</li> <li>• To ensure the quality or safety of a product, service, or device</li> <li>• To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, or processing payments</li> <li>• To enhance your experience on our website in real time, so long as we do not disclose your information to a third party</li> </ul>	
<b>Racial or ethnic origin</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>• To conduct business with you or your employer in your role with a third party that we do business with</li> <li>• In accordance with applicable law and investor guidelines</li> </ul>	

**We may also disclose your personal information to the following categories of third parties:**

- **At Your Direction.** We may disclose your personal information to any third party with your consent or at your direction.
- **Business Transfers or Assignments.** We may disclose your personal information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- **Legal and Regulatory.** We may disclose your personal information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

The categories identified as collected in the tables above were collected from the following categories of sources:

- You directly
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers
- Credit Reporting Agencies
- Appraisers
- Insurance Companies
- Employers
- Real Estate Brokers
- Investors
- Prior servicers
- Information from third party service providers

#### **Selling to Third Parties or Sharing with Third Parties for Cross-Context Behavioral Advertising**

We have not and do not sell any of your personal information or share with third parties for cross-context behavioral advertising (including any sensitive personal information). We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

#### **Your Right to Know**

You have the right to request that we disclose any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the business or commercial purpose for collecting, selling, or sharing with third parties for cross context behavioral advertising (e.g. targeted advertising)

- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

### **Your Right to Request Correction of Inaccurate Personal Information**

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements. We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

### **Your Right to Request Deletion of Your Personal Information**

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

### **Submitting a Verified Consumer Request**

You have the right to submit verified consumer requests to know information, to correct information, or for deletion.

You can submit a request to know information, to correct information, or for deletion by (1) emailing us at [CustomerService.Department@seleneFinance.com](mailto:CustomerService.Department@seleneFinance.com) , or [2] by calling us toll-free at 877-735-3637. Please provide your full name, last 4 of you social security number, account number, property address, mailing address if different, and the type of request you are making. Your request will be verified by matching the information you provide to information that we have collected.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

### **Using an Authorized Agent to Submit a Request**

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have 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. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

If you're an authorized agent making a request, you must email us at [CustomerService.Department@seleneFinance.com](mailto:CustomerService.Department@seleneFinance.com) and:

1. Provide a copy of a power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or
2. Provide proof of signed permission along with a copy of your ID **and** have the consumer e-mail us at [CustomerService.Department@seleneFinance.com](mailto:CustomerService.Department@seleneFinance.com) to directly confirm with us that they provided you permission to submit the request.

### **Your Right to Non-Discrimination for the Exercise of a Privacy Right**

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.

### **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 the updated notice on the 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 for More Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information, 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: 877-735-3637

Website: [www.selenefinance.com](http://www.selenefinance.com)

Email: [CustomerService.Department@seleneFinance.com](mailto:CustomerService.Department@seleneFinance.com)

Postal Address:

Selene Finance LP

Attn: Customer Service

3501 Olympus Boulevard

Suite 500, 5<sup>th</sup> Floor

Dallas, Texas 75019

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