

# Privacy Policy

Effective Date: 07/05/2023

If you are a California resident, please [Click here](#) to review our California Consumer Privacy Act notice.

This Privacy Policy applies to your interaction with Guild Mortgage Company or any of its wholly owned subsidiaries, including Mission Village Insurance Agency (collectively, “we” or “us”). We operate the <https://www.guildmortgage.com/> website and related mobile applications for the solicitation, origination, servicing, and sale of mortgage loans (hereinafter collectively referred to as the “Service”). We also operate the <https://www.missionvillageins.com> website for the solicitation of homeowner’s insurance. 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.

Our U.S. Consumer Privacy Notice (<https://www.guildmortgage.com/privacy-notice/>) contains information on how we may share information with affiliates and third parties.

By using the Service (on and offline), you agree to the collection and use of information in accordance with this Privacy 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”). Personal Data includes, 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.

## **How We Obtain Personal Data**

We collect Personal Data from a wide range of other sources in order to provide you the Service. These sources may include among others, directly from you, 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. Opting out of email communications from Mission Village Insurance Agency will not opt you out of receiving communications from Guild Mortgage Company. You must separately opt out of receiving communications from Guild Mortgage Company and Mission Village Insurance Agency by following the unsubscribe link in emails from each entity.

## **How We Obtain Usage Data**

We 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.

## **How We Obtain Location Data**

We collect and store information about your location if you give us permission to do so (“Location Data”). We use Location 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. 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.

## **Contact forms**

If you fill out a contact form on our site, we store that information in a database and use the information to respond to you regarding the reason you contacted us. In addition, we collect phone contacts in the mobile app when you share the app.

## **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;
- 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; and
- To comply with our legal obligations and rights.

## **Transfer of Data**

Our Service (including our websites) is only intended for people located within the United States. 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 the collection of data and subsequent transfer to the United States. 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.

## **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 Guild Mortgage Company;
- 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 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 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**

Our websites do not respond to or honor Do Not Track signals.

## **Analytics**

We may use third-parties to monitor and analyze the use of our Service. Examples include:

### **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. 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. You may 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>.

## **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 policies.

## **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.

## **Social Media**

We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about disclosing your information through those platforms and networks with us.

## **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 Data 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, please contact Customer Service at 1-800-365-4441.

## For California Residents Only

The following information is only applicable to California residents (“consumers”). The terminology used below relies on and is drawn from the California Consumer Privacy Act of 2018 (“CCPA”).

**AS A COURTESY, THE FOLLOWING DISCLOSURES INCLUDE INFORMATION THAT IS EXEMPT FROM CCPA. THE COURTESY DISCLOSURES ARE MADE WITH A RESERVATION OF ALL RIGHTS THAT WE HAVE UNDER CCPA.**

### Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). Amongst others, personal information does not include publicly available information; de-identified or aggregated information; and information covered by certain industry-specific privacy laws such as the Fair Credit Reporting Act (FCRA), Gramm-Leach-Bliley Act (GLBA), and California Financial Information Privacy Act (FIPA).

We have collected, and will collect, the following categories of personal information about our California consumers:

- “Sensitive Personal Information” such as Social Security numbers (SSNs), Driver’s license, financial account or card numbers, Precise geolocation, Racial and ethnic characteristics, Contents of mail, email and text messages, Genetic and biometric data.

- “Personal Identifiers” such as name, alias, address, unique identifier, internet protocol address, email address, account number, Social Security Number, or government identification number.
- “Other Personal Information” as 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.
- “Protected Characteristics” under California or federal law for classifications such as age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), or veteran or military status.
- “Commercial Information” such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- “Internet or Other Electronic Network Activity Information” such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- “Geolocation Data” such as physical movements or location.
- “Sensory Data” such as audio, electronic, visual, thermal, olfactory, or similar information.
- “Professional or Employment-Related Information” such as current or past job history or performance evaluations.
- “Inferences” such as profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We will not collect additional categories of personal information or use personal information collected for additional purposes without notifying you.

## **Sources of Personal Information**

- Categories of sources from which we have collected the personal information:
  - Directly from you
  - Vendors including both service providers and third parties
  - Automatically collected through your usage of our Service
  - Publicly available sources
  - Applicants and employees



## Uses of Personal Information

We use personal information for the following purposes:

- Performing services on behalf of Guild, 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 Guild.
- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.
- Providing advertising and marketing services, except for cross-contextual behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the business with personal information that the service provider or contractor receives from, or on behalf of, another person or personal or collects from its own interactions with consumers.
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- 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.
- Support employment, infrastructure, and human resource management including providing benefits to employees, beneficiaries and dependents such as healthcare and retirement plans.

## Disclosure of Personal Information

We disclose categories of personal information with outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, as part of providing products and services, completing transactions, supporting our everyday operations, business management or development, and compliance. Such third parties may include:

- Affiliated Financial or Nonfinancial Companies: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Inferences.
- Marketing Providers: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Inferences.
- Advisors (examples include attorneys, consultants, and accountants): Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Inferences.
- Regulators and governmental agencies: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Inferences.
- Shipping vendors: Personal Identifiers, Other Personal Information.
- Credit reporting agencies and dispute vendors: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, Inferences.
- Foreclosure trustees and vendors: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, Inferences.
- Law enforcement, government entities, courts, and pursuant to legal process: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Inferences.
- Human resources, information security and workforce management vendors: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Protected Characteristics, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Professional or Employment-Related Information, Inferences.

We share personal information for the purpose of cross-contextual behavioral advertising. In doing so, we disclose the following categories of personal information: Personal Identifiers, Other Personal Information, Sensitive Personal Information, Commercial Information, Internet or Other Electronic Network Activity Information, Geolocation Data, Sensory Data, Inferences.

We do not sell the personal information of minors under 18 years of age without affirmative authorization.

## **Retention of Personal Information**

We store personal information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

## **Consumer Rights Under the CCPA**

### **Right to Know**

You have a right to request that we disclose to you the following (“Right to Know”):

- The categories of personal information we have collected about you.
- The categories of sensitive personal information we have collected about you.
- The categories of sources from which we have collected personal information about you.
- Our business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we have disclosed personal information and the corresponding categories of personal information.
- If we sold or shared your personal information, the categories of personal information disclosed and a description of the receiving third parties.
- The specific pieces of personal information that we have collected about you.

### **Right to Delete**

You have a right to request that we delete your personal information (“Right to Delete”). Once we receive and verify your request, we will delete, de-identify, or aggregate your personal information unless an exception applies.

We may deny your Request to Delete if retaining the personal information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.

- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business and compatible with the context in which the consumer provided the information.
- Comply with a legal obligation.

## **Right to Correct**

You have a right to request that we correct your personal information if it is inaccurate ("Right to Correct"). Once we verify your identity and confirm that your personal information is inaccurate, we will make the correction.

## **Right to Limit the Use of Sensitive Personal Information**

You have the right to direct a business that collects your Sensitive Personal Information to limit its use to uses which are necessary to perform the services or provide the goods reasonably expected. However, we only use Sensitive Personal Information as exempt from the CCPA; to provide the goods and services requested by you; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for such actions; to ensure people's physical safety; to perform services on our behalf; to verify or maintain the quality or safety of our products, services, and devices; to provide employment related services including compensation and benefits.

## **Right to Opt Out and How to Submit a Request to Opt Out**

You have a right to opt out of the sharing of your personal information.

You may submit a Request to Opt Out by clicking our [Do Not Share My Personal Information](#) link.

The CCPA gives consumers the right to opt-out of the use of automated decision-making technology in connection with decisions about the consumer's work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, we do not use automated decision-making technology for personal information that is not covered by FCRA, GLBA, and CalFIPA.

## **Right to Nondiscrimination**

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.

## **Submitting a Request to Know, Request to Delete or Request to Correct**

You may submit a request to us for the information described above by:

- calling (833) 953-1480
- visiting <https://www.guildmortgage.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. 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.

## **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.

## **Contact Us**

For questions or concerns regarding Guild’s privacy policies and practices, you may email us at [privacyrequest@guildmortgage.net](mailto:privacyrequest@guildmortgage.net), call us at (833) 953-1480, or write us at Guild Mortgage Company, Attn: Legal Department, 5887 Copley Drive, San Diego, CA 92111. For questions or concerns regarding Mission Village Insurance Agency’s privacy policies and practices, you may email us at [privacyrequest@guildmortgage.net](mailto:privacyrequest@guildmortgage.net), call us at (833) 953-1480, or write us at Mission Village Insurance Agency, Attn: Legal Department, 5887 Copley Drive, San Diego, CA 92111.