

# CALIFORNIA CONSUMER PRIVACY ACT (“CCPA”) POLICY

\*ONLY APPLICABLE TO CALIFORNIA CONSUMERS

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### ARTICLE I. PURPOSE

California Consumer Privacy Act of 2018 (“CCPA”)

The CCPA was enacted to enhance privacy rights and provide additional consumer protection for California residents.

True Path Servicing implements this policy to enable True Path Servicing employees and management to service California consumer’s accounts in compliance with the CCPA. This policy will be reviewed and updated as necessary.

### ARTICLE II. SCOPE

This policy includes in scope: All True Path Servicing management and employees with respect to California consumers.

### ARTICLE III. CCPA STATUTORY TEXT AND DEFINITIONS

#### Section 3.01 CCPA Statutory Text

TITLE 1.81.5. California Consumer Privacy Act of 2018 can be found here:

[http://leginfo.legislature.ca.gov/faces/codes\\_displayText.xhtml?lawCode=CIV&division=3.&title=1.81.5.&part=4.&chapter=&article](http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=3.&title=1.81.5.&part=4.&chapter=&article)

#### Section 3.02 CALIFORNIA ATTORNEY GENERAL CCPA REGULATIONS

Revised: 4/15/2025

True Path Servicing – CCPA

Policy Created: 4/15/2025

On August 14, 2020, the Office of Administrative Law (OAL) approved the Department of Justice’s regulations regarding the CCPA. These CCPA Regulations can be found here:

<https://oag.ca.gov/privacy/ccpa/regs>

### Section 3.03 DEFINITIONS

This Policy references various CCPA-defined terms. Full definitions are located in CCPA Section 1798.140 and can be found here:

[http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=CIV&sectionNum=1798.140](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CIV&sectionNum=1798.140).

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information includes, but is not limited to, the following if it identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household.

“Consumer(s)” referenced in this Policy specifically refers to only California consumers.

### ARTICLE IV. TYPES OF PERSONAL INFORMATION CCMR3 RECEIVES, COLLECTS, AND USES

As required by the CCPA, True Path Servicing’s management team conducted a comprehensive review of the types of Personal Information True Path Servicing receives, collects and/or uses in the course of servicing California consumer’s accounts. True Path Servicing identified the following:

<b>CCPA Categories</b>	<b>True Path Servicing Receives/Collects/Uses</b>
Identifiers	Name, address, email address, Social Security number, signature, date of birth, IP Address, or other similar identifier
Personal Information	Contact and financial information
Protected Classifications Under California or Federal Law	Age, marital status, sex, and veteran or military
Commercial Information	Information about consumer accounts or transactions
Internet or Similar Network Activity Information	Information about a consumer’s interaction with our website
Audio, Electronic, Visual, or Similar Information	Call recordings

Inferences Drawn From Other Personal Information	Certain inferences concerning a consumer’s preferences or characteristics
Professional or employment related information	Information related to employment

True Path Servicing’s management will actively review and update this list as needed.

**ARTICLE V. PROCEDURES TO COMPLY WITH NOTICE REQUIREMENTS**

**5.01 Notice of Privacy Policy-** True Path Servicing shall provide a privacy policy in accordance with the CCPA and section 999.308

**5.02 Notice at or before Point of Collection**

True Path Servicing shall provide consumers with timely notice, at or before the point of collection, about the categories of Personal Information it will collect from them and the purposes for which the Personal Information will be used.

**5.03 Notice of Right to Opt-Out of Sale of Personal Information**

**Section 5.01 Notice of Privacy Policy**

**True Path Servicing’s privacy policy shall provide consumers with a comprehensive description of True Path Servicing’s online and offline practices regarding the collection, use, and disclosure of Personal Information and of the rights of consumers regarding their personal information.**

- (a) True Path Servicing’s privacy policy shall be designed and presented in a way that is easy to read and understandable to consumers. The policy shall:
  1. Use plain, straightforward language and avoid technical or legal jargon.
  2. Use a format that makes the policy readable.
  3. Be reasonably accessible to consumers with disabilities.
  4. Be available in a format that allows a consumer to print it out as a document.
  
- (b) True Path Servicing’s privacy policy shall be posted online through a conspicuous link using the word “privacy” on its website homepage.

(c) True Path Servicing's privacy policy shall include the following information:

1. **Right to Know About Personal Information Collected, Disclosed, or Sold.**
  - a. Explanation that a consumer has the right to request that True Path Servicing disclose what Personal Information it collects, uses, discloses, and sells.
  - b. Instructions for submitting a verifiable consumer request to know and links to an online request form.
  - c. General description of the process True Path Servicing will use to verify the consumer request, including any information the consumer must provide.
  - d. Identification of the categories of Personal Information True Path Servicing has collected about consumers in the preceding 12 months. The categories shall be described in a manner that provides consumers a meaningful understanding of the information being collected.
  - e. Identification of the categories of sources from which the Personal Information is collected.
  - f. Identification of the business or commercial purpose for collecting or selling personal information. The purpose shall be described in a manner that provides consumers a meaningful understanding of why the information is collected or sold.
  - g. A statement that True Path Servicing does not sell Personal Information.
2. **Right to Request Deletion of Personal Information.**
  - a. Explanation that the consumer has a right to request the deletion of certain Personal Information collected by True Path Servicing, subject to exclusions for Personal Information required to fulfill its business purpose of account servicing.
  - b. Instructions for submitting a verifiable consumer request to delete and links to an online request form.
  - c. General description of the process True Path Servicing will use to verify the consumer's request to delete, including any information the consumer must provide.
3. **Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights.**
  - a. Explanation that the consumer has a right not to receive discriminatory treatment by True Path Servicing for the exercise of the privacy rights conferred by the CCPA.

4. **Authorized Agent.**
  - a. Instructions on how an authorized agent can make a request under the CCPA on the consumer's behalf.
5. **Contact for More Information.**
  - a. A contact for questions or concerns about True Path Servicing's privacy policies and practices using a method reflecting the manner in which True Path Servicing primarily interacts with the consumer.
6. **Date the privacy policy was last updated.**

## Section 5.02 Notice at or Before Point of Collection

**True Path Servicing shall provide consumers with timely notice, at or before the point of collection, about the categories of Personal Information it will collect from them and the purposes for which the Personal Information will be used.**

1. The notice shall:
  - a. Use plain, straightforward language and avoid technical or legal jargon.
  - b. Use a format that draws the consumer's attention to the notice and makes the notice readable, including on smaller screens, if applicable.
  - c. Be reasonably accessible to consumers with disabilities.
2. The 'notice at collection' shall be made at the time True Path Servicing sends its initial notice to the consumer.
3. True Path Servicing shall not collect categories of Personal Information other than those disclosed in the notice at collection.
4. The "notice at collection" shall include the following:
  - a. A list of the categories of Personal Information to be collected. Each category of Personal Information shall be written in a manner that provides consumers a meaningful understanding of the information being collected.
  - b. The business or commercial purpose(s) for which the categories of Personal Information will be used.
  - c. Instructions on how True Path Servicing's privacy policy can be found online.

## Section 5.03 Notice of Right to Opt-Out of Sale of Personal Information

### **True Path Servicing does not sell any Personal Information.**

As required by the CCPA, True Path Servicing shall disclose the following in its Privacy Policy: “True Path Servicing does not sell Personal Information.”

If True Path Servicing begins, at any time, to sell any Personal Information, it shall immediately notify all applicable consumers.

## **ARTICLE VI. METHODS AVAILABLE FOR CALIFORNIA CONSUMERS TO SUBMIT REQUESTS**

True Path Servicing shall designate at least two methods for consumers to submit their request. True Path Servicing's current methods are:

### **1. Email address**

- a. Consumers may send their requests to [help@truepathservicing.com](mailto:help@truepathservicing.com). A member from True Path Servicing's management team is responsible for monitoring this email address and notating each request received.

### **2. Phone**

- a. Consumers may submit their request via phone: 844-615-9960

## **ARTICLE VII. PROCEDURES TO RESPOND TO CONSUMER REQUESTS**

### **IN GENERAL**

- (1) **Cost:** CCMR3 shall not charge a consumer or its agent for responding to Requests.
- (2) **Confirmation of Request, Timing, and Verification:** True Path Servicing shall respond to consumer requests within 45 calendar days of receipt of the request. True Path Servicing may extend that deadline by another 45 days (90 days total) if True Path Servicing notifies the consumer.
  - a. Upon receiving a request to know or a request to delete, True Path Servicing shall confirm receipt of the request within 10 business days and provide information about how True Path Servicing will process the request. The information provided shall describe in general True Path Servicing's verification process and when the consumer should expect a response, except in instances where True Path Servicing has already granted or denied the request. The confirmation may be given in the same manner in which the

request was received. For example, if the request is made over the phone, the confirmation may be given orally during the phone call.

- b. True Path Servicing shall respond to requests to know and requests to delete within 45 calendar days. The 45-day period will begin on the day True Path Servicing receives the request, regardless of time required to verify the request. If True Path Servicing cannot verify the consumer within the 45-day time period, True Path Servicing may deny the request. If necessary, True Path Servicing may take up to an additional 45 calendar days to respond to the consumer's request, for a maximum total of 90 calendar days from the day the request is received, provided that True Path Servicing provides the consumer with notice and an explanation of the reason True Path Servicing will take more than 45 days to respond to the request.

## RESPONDING TO REQUESTS TO KNOW

- (1) For requests that seek the disclosure of specific pieces of information about the consumer, if True Path Servicing cannot verify the identity of the person making the request pursuant to the CCPA's Regulations, True Path Servicing shall not disclose any specific pieces of Personal Information to the requestor and shall inform the requestor that it cannot verify their identity. If the request is denied in whole or in part, True Path Servicing shall also evaluate the consumer's request as if it is seeking the disclosure of categories of Personal Information about the consumer as explained in (2) below.
- (2) For requests that seek the disclosure of categories of Personal Information about the consumer, if True Path Servicing cannot verify the identity of the person making the request pursuant to the CCPA's Regulations, True Path Servicing may deny the request to disclose the categories and other information requested and shall inform the requestor that it cannot verify their identity. If the request is denied in whole or in part, True Path Servicing shall provide or direct the consumer to its general business practices regarding the collection, maintenance, and sale of Personal Information set forth in its privacy policy.
- (3) In responding to a request to know, True Path Servicing is not required to search for Personal Information if all of the following conditions are met:
  - a. True Path Servicing does not maintain the Personal Information in a searchable or reasonably accessible format;
  - b. True Path Servicing maintains the Personal Information solely for legal or compliance purposes;
  - c. True Path Servicing does not sell the Personal Information and does not use it for any commercial purpose; and
  - d. True Path Servicing describes to the consumer the categories of records that may contain Personal Information that it did not search because it meets the conditions stated above.

- (4) True Path Servicing shall not disclose in response to a request to know a consumer’s Social Security number, driver’s license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. True Path Servicing shall, however, inform the consumer with sufficient particularity that it has collected the type of information. For example, a business shall respond that it collects “unique biometric data including a fingerprint scan” without disclosing the actual fingerprint scan data.
- (5) If True Path Servicing denies a consumer’s verified request to know specific pieces of personal information, in whole or in part, because of a conflict with federal or state law, or an exception to the CCPA, True Path Servicing shall inform the requestor and explain the basis for the denial, unless prohibited from doing so by law. If the request is denied only in part, True Path Servicing shall disclose the other information sought by the consumer.
- (6) True Path Servicing shall use reasonable security measures when transmitting Personal Information to the consumer.
- (7) If True Path Servicing maintains a password-protected account with the consumer, it may comply with a request to know by using a secure self-service portal for consumers to access, view, and receive a portable copy of their Personal Information if the portal fully discloses the Personal Information that the consumer is entitled to under the CCPA and the California AG’s CCPA Regulations, uses reasonable data security controls, and complies with the verification requirements set forth the CCPA Regulations.
- (8) Unless otherwise specified by True Path Servicing to cover a longer period of time, the 12- month period covered by a consumer’s verifiable request to know referenced in Civil Code section 1798.130, subdivision (a)(2), shall run from the date True Path Servicing receives the request, regardless of the time required to verify the request.
- (9) In responding to a consumer’s verified request to know categories of Personal Information, categories of sources, and/or categories of third parties, True Path Servicing shall provide an individualized response to the consumer as required by the CCPA. It shall not refer the consumer to True Path Servicing’s general practices outlined in its privacy policy unless its response would be the same for all consumers and the privacy policy discloses all the information that is otherwise required to be in a response to a request to know such categories.
- (10) In responding to a verified request to know categories of Personal Information, True Path Servicing shall provide:
  - a. The categories of Personal Information True Path Servicing has collected about the consumer in the preceding 12 months;

- b. The categories of sources from which the Personal Information was collected;
  - c. The business or commercial purpose for which it collected or sold the personal information;
  - d. The categories of third parties with whom True Path Servicing shares personal information; and
  - e. The categories of Personal Information that True Path Servicing disclosed for a business purpose in the preceding 12 months, and for each category identified, the categories of third parties to whom it disclosed that particular category of personal information.
- (11) True Path Servicing shall identify the categories of personal information, categories of sources of personal information, and categories of third parties to whom True Path Servicing disclosed personal information, in a manner that provides consumers a meaningful understanding of the categories listed.

## **RESPONDING TO REQUESTS TO DELETE**

- (1) For requests to delete, if True Path Servicing cannot verify the identity of the requestor pursuant to the CCPA Regulations, True Path Servicing may deny the request to delete. True Path Servicing shall inform the requestor that their identity cannot be verified.
- (2) True Path Servicing shall comply with a consumer's request to delete their Personal Information by:
- a. Permanently and completely erasing the Personal Information on its existing systems with the exception of archived or back-up systems;
  - b. Deidentifying the personal information; or
  - c. Aggregating the consumer information.
- (3) If True Path Servicing stores any Personal Information on archived or backup systems, it may delay compliance with the consumer's request to delete, with respect to data stored on the archived or backup system, until the archived or backup system relating to that data is restored to an active system or next accessed or used for a sale, disclosure, or commercial purpose.
- (4) In responding to a request to delete, True Path Servicing shall inform the consumer whether or not it has complied with the consumer's request.
- (5) If True Path Servicing complies with the consumer's request, True Path Servicing shall inform the consumer that it will maintain a record of the request as required by section 999.317, subsection (b). True Path Servicing may retain a record of the request for the purpose of ensuring that the consumer's Personal Information remains deleted from True Path Servicing's records.
- (6) In cases where True Path Servicing denies a consumer's request to delete, True Path Servicing shall do all of the following:

- a. Inform the consumer that it will not comply with the consumer’s request and describe the basis for the denial, including any conflict with federal or state law, or exception to the CCPA, unless prohibited from doing so by law;
- b. Delete the consumer’s Personal Information that is not subject to the exception; and
- c. Not use the consumer’s Personal Information retained for any other purpose than provided for by that exception.

(8) In responding to a request to delete, True Path Servicing may present the consumer with the choice to delete select portions of their Personal Information only if a global option to delete all Personal Information is also offered and more prominently presented than the other choices.

**TRUE PATH SERVICING MAY DENY CERTAIN CONSUMER REQUESTS**

True Path Servicing may deny a consumer’s request for the following reasons:

1. True Path Servicing cannot verify the consumer’s request.
2. The request is manifestly unfounded or excessive, or True Path Servicing has already provided Personal Information to the consumer more than twice in a 12-month period.
3. True Path Servicing will not disclose certain sensitive information, such as a consumer’s social security number, financial account number, or account passwords, but True Path Servicing will provide a response that states the general category of information collected.
4. Disclosure would restrict True Path Servicing’s ability to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
5. If the Personal Information is certain medical information, consumer credit reporting information, or other types of information exempt from the CCPA.
6. If the Personal Information is needed to enable True Path Servicing to complete its business purpose (to service accounts).
7. Additional reasons listed in Civil Code section 1798.145.

**ARTICLE VIII. CCMR3’S ROLE AS A “SERVICE PROVIDER” TO ITS CREDITOR CLIENTS**

In the event True Path Servicing meets the definition of a “Service Provider” under the CCPA regarding the services it provides to its creditor clients, it will comply with the following obligations:

- (a) In its role as a Service Provider, True Path Servicing shall not retain, use, or disclose Personal Information obtained in the course of providing services except:
  - (1) To process or maintain Personal Information on behalf of the business that provided the Personal Information or directed True Path Servicing to collect the personal information, and in compliance with the written contract for services required by the CCPA;

- (2) To retain and employ another Service Provider as a subcontractor, where the subcontractor meets the requirements for a service provider under the CCPA and these regulations;
  - (3) For internal use by True Path Servicing to build or improve the quality of its services, provided that the use does not include building or modifying household or consumer profiles to use in providing services to another business, or correcting or augmenting data acquired from another source;
  - (4) To detect data security incidents or protect against fraudulent or illegal activity; or
  - (5) For the purposes enumerated in Civil Code section 1798.145, subdivisions (a)(1) through (a)(4).
- (b) In its role as a Service Provider, if True Path Servicing receives a request to know or a request to delete from a consumer, True Path Servicing shall either act on behalf of its creditor client in responding to the request or inform the consumer that the request cannot be acted upon because the request was sent to True Path Servicing in its role as a service provider for its creditor client(s).

## **ARTICLE IX. RECORD RETENTION**

- (a) All True Path Servicing employees responsible for handling consumer inquiries about True Path Servicing's privacy practices or True Path Servicing's compliance with the CCPA shall be informed of all of the requirements in the CCPA and the CCPA Regulations and how to direct consumers to exercise their rights under the CCPA and CCPA Regulations.
- (b) True Path Servicing shall maintain records of consumer requests made pursuant to the CCPA and how it responded to the requests for at least 24 months. True Path Servicing shall implement and maintain reasonable security procedures and practices in maintaining these records.
- (c) The records may be maintained in a ticket or log format provided that the ticket or log includes the date of request, nature of request, manner in which the request was made, the date of True Servicing's response, the nature of the response, and the basis for the denial of the request if the request is denied in whole or in part.
- (d) True Path Servicing's maintenance of the information required by this Record Retention section, where that information is not used for any other purpose, does not taken alone violate the CCPA or CCPA Regulations.
- (e) Information maintained for record-keeping purposes shall not be used for any other purpose except as reasonably necessary for True Path Servicing to review and modify its processes for compliance with the CCPA and CCPA Regulations. Information

maintained for recordkeeping purposes shall not be shared with any third party except as necessary to comply with a legal obligation.

- (f) Other than as required by subsection (b), True Path Servicing is not required to retain Personal Information solely for the purpose of fulfilling a consumer request made under the CCPA.

## ARTICLE X. RAMIFICATIONS

Non-compliance with this Policy will be considered a major non-conformity.