



Effective Date: 4.23.26
Next Review Date: 1.1.27
Approval Authority: Board
Business Owner: Risk

Employee and Contractor Privacy Policy

Last Updated: 4.23.2026

This Employee and Contractor Privacy Policy (the “**Privacy Policy**”) contains the policies and procedures to be followed by Change Lending, LLC d/b/a Change Home Mortgage and its affiliates and subsidiaries, including its present or future subsidiaries (the “**Company**,” “**Change Lending**,” “**we**,” “**us**,” or “**our**”) related to the collection and use of personal information of an applicant, an employee (“**Employee**”), a Company officer or director, or a contractor in the United States, (collectively referred to this in Privacy Policy as the “**Employee/Contractor**,” “**you**,” or “**your**”). Note: A “**Contractor**” is a non-employee who performs services for Change Lending and is not employed by the Company. Certain sections of this privacy policy do not apply to Contractors.

Change Lending wants you to understand how and why we collect “**Personal Information**,” which includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Employee/Contractor.

Change Lending is committed to protecting the privacy of all of our Employees/Contractors, and we take administrative, technical, and physical safeguards to protect your Personal Information from unauthorized access, misuse, accidental loss, or alteration. However, Employees/Contractors should have no expectation of privacy when using technology provided by Change Lending or whenever accessing Change Lending technology resources or information.

If you are a resident of California, please see the attached California Privacy Notice Addendum for a full list of the disclosures and rights available to you under California law.

1. NOTICE OF EMPLOYEE MONITORING

We may monitor telephonic and electronic conversations or transmissions, including e-mail and internet access, by Employees/Contractors conducted using our systems or devices. This includes use of systems, computers, telephones, and other devices provided or maintained by the Company or by our service providers. We may monitor these devices and services to ensure their safety, security, and efficiency, and to permit internal evaluations.

2. TYPES OF PERSONAL INFORMATION WE COLLECT

The following chart explains the categories of Personal Information that we may collect or process and the specific reasons for which we process each category of information. For more detailed information regarding why we process each category of information, please see the Purposes of Collection section, below.

Categories	Examples	Purposes for Collection
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	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Comply with Legal Obligations - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property - Ensure the Security of Our Systems
B. Personal Information (this category may overlap with other categories)	<p>A 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, medical information, or health insurance information</p> <p>Some Personal Information included in this category may overlap with other categories</p>	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Comply with Legal Obligations - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property - Ensure the Security of Our Systems

Categories	Examples	Purposes for Collection
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)	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Comply with Legal Obligations - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property
D. Commercial Information	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"> - Facilitate Communications and Efficiency - Provide Benefits
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	<ul style="list-style-type: none"> - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Security of Our Systems

Categories	Examples	Purposes for Collection
G. Geolocation Data	Physical location or movements	<ul style="list-style-type: none"> - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Comply with Legal Obligations - Facilitate Communications and Efficiency - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property
I. Professional or Employment Related Information	Current or past job history or performance evaluations	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Comply with Legal Obligations - Ensure the Safety of Employees, Contractors, Facilities, and Property

Categories	Examples	Purposes for Collection
J. Non-Public Education Information	Education records and transcripts	<ul style="list-style-type: none"> - Administer the Employee Relationship - Comply with Legal Obligations - Ensure the Safety of Employees, Contractors, Facilities, and Property
K. Inferences Drawn	Inferences drawn from Personal Information identified above to create a profile about an individual reflecting an individual’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<ul style="list-style-type: none"> - Facilitate Communications and Efficiency - Provide Benefits
L. Sensitive Personal Information	<p>Personal Information that reveals (a) Social Security, driver’s license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credential allowing access to an account; (c) precise geolocation; (d) racial or ethnic origin, religious, or philosophical beliefs, or union membership; (e) political opinions; or (f) the contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication</p> <p>Biometric information processed for the purpose of uniquely identifying a consumer, Personal Information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation.</p> <p>Some Sensitive Personal Information included in this category may overlap with other categories</p>	<ul style="list-style-type: none"> - Administer the Employee/Contractor Relationship - Provide Benefits - Ensure the Safety of Employees, Contractors, Facilities, and Property

3. PURPOSES OF COLLECTION

We use your personal information for a variety of business purposes, including to administer the employment/contractor relationship, to comply with legal obligations, to facilitate communications and efficiency, to provide benefits, and to ensure the safety of employees, contractors, facilities, and property as described below.

A. Administering the Employment/Contractor Relationship

We keep and process Personal Information for traditional employment and contractor engagement purposes. We use this information for management and administrative uses and only disclose it with others who have a need-to-know such information. We keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, and after your employment or contract has ended. This includes using Personal Information to enable us to comply with any legal requirements associated with an employee or contractor relationship, to administer payroll, to provide you with benefits, ensure your safety, comply with an employment or service contract, and to demonstrate our commitment to equal employment opportunity and fair employment practices.

B. Compliance with Legal Obligations

In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations. This may include:

- Tracking demographic information to confirm compliance with equal opportunity and non-discrimination policies and requirements;
- Processing information relating to your health, which could include reasons for absence and doctor's reports and notes, in order to comply with our obligations under applicable employment and safety and health laws;
- Processing information regarding certifications and qualifications for your role or position;
- Processing information regarding participation in employment related activities about which we are required to retain a record; and/or
- Processing information relevant to any alleged violations of the Code of Conduct or other Company policies necessary to investigate allegations and institute disciplinary action as is required.

C. Facilitate Communications and Efficiency

The Company uses various tools and platforms that allow Employees/Contractors to more easily communicate with each other and to more efficiently access and disclose various types of work product and schedules. Some tools may also allow Employees/Contractors to disclose information via social media or other channels, including information relating to job opportunities.

These tools and platforms may collect and disclose contact information and company profile pictures; log certain preferences and actions; collect your geolocation; and create user profiles that allow Employees and the Company to track their efficiency and performance. We may also have access to communications sent using Company systems and devices.

D. Provide Benefits

We offer Employees a variety of benefits, including benefits related to healthcare, retirement savings, and the ability to order goods and services directly from the Company. If Employees take advantage of other benefits, such as fitness-related benefits, we may also collect additional biometric and sensory information. When you participate in certain benefits programs, we may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences.

All benefits may not be available to all Employees, and the Company will only collect Personal Information to provide a benefit if the Employee is eligible for and enrolled in that benefit. Employees should take care to read the specific terms applicable to any particular mobile application or benefits program to understand the specific pieces of information collected.

We may receive additional information about you from third parties or marketing partners and combine it with other information we have about you.

E. Ensure the Safety of Employees, Contractors, Facilities, and Property

We collect various categories of information to ensure the safety of Employees/Contractors, facilities and property. This information helps verify the identity of Employees/Contractors in specific facilities and ensure the security of facilities and Company vehicles. Additionally, we may process certain categories of Personal Information to ensure the safety and security of our electronic systems and devices. This includes monitoring our systems for suspicious or fraudulent activity and other forms of

illegal conduct. This monitoring is critical to ensure the safety and security of our systems and the confidential information that is entrusted to us.

4. RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information until the personal information is no longer necessary to accomplish the purpose for which it was provided, until the expiry of the employment/contractor relationship, as necessary in accordance with applicable law and regulation, or for certain business purposes.

5. DISPOSAL OF PERSONAL INFORMATION

We take appropriate measures to ensure that your Personal Information is processed and disposed of in a manner that maintains its confidentiality. All Personal Information disposal procedures, including the disposal of computerized data storage devices, are designed to ensure the complete destruction of Personal Information and eliminate the risk of subsequent unauthorized access or disclosure.

6. POLICY CHANGES

This Privacy Policy is subject to occasional revision, and if we make any material changes in the categories of information we collect or the reasons we collect that information, we will notify you by sending you an e-mail and/or by prominently posting notice of the changes. This Privacy Policy will also be posted to Sharepoint. You can review or consult the Privacy Policy at any time.

The Company may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction in which Employees/Contractors reside. If any term, covenant, condition, or provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid, void, or unenforceable, it is the intent of this Privacy Policy that the scope of the rights and obligations of the Privacy Policy be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Privacy Policy statement will in no way be affected, impaired, or invalidated as a result.

7. CONTACT US

If you have any questions about this Privacy Policy, please contact the Legal Department at legal@changemtg.com.

Change Lending, LLC
California Privacy Notice Addendum

Last Updated: 3.11.2026

This California Privacy Notice Addendum (“**California Addendum**”) applies to applicants, employees, and contractors that are residents of the state of California. This California Addendum supplements our Employee and Contractor Privacy Policy (“**Privacy Policy**”). Words reused in this California Addendum shall be interpreted as defined by the California Consumer Privacy Act, Cal. Civ. Code § 1798.100 *et seq.*, as amended by the California Privacy Rights Act, and implementing regulations (collectively, the “**CCPA**”).

This California Addendum will provide you with a summary of the categories of information we collect, the reasons that we collect each category of information, information regarding how we may disclose your Personal Information with third parties, and information regarding your rights under the CCPA

1. INFORMATION WE COLLECT AND SOURCES OF INFORMATION

In the preceding 12 months, we have collected the categories of Personal Information identified above in the Employee and Contractor Privacy Policy. We collect the majority of the information directly from you, through the applications or forms you submit and the information you provide at the time of hiring. In addition to the information that you provide to us, we may collect information about you from third parties, such as information from third parties that provide accreditation, educational institutions, benefits providers, and vendors that provide background checks or related information. Finally, we may automatically collect, store, or otherwise process information about you as you use our tools, systems, or resources, or when you are on-site at one of our locations.

2. HOW YOUR PERSONAL INFORMATION IS DISCLOSED

We may collect, use, or disclose your Personal Information as described below.

A. Disclosure of Personal Information

In the preceding 12 months, we have disclosed Personal Information in the following categories: A (Identifiers), B (Personal), C (Classification), D (Commercial), F (Internet), I (Professional), L (Sensitive) with service providers who are necessary for facilitating the employment relationship and providing you with benefits.

Where necessary, we enter into written contracts with our service providers to ensure the privacy and security of your Personal Information. Under these contracts, we restrict the access to and processing of your Personal Information to that which is necessary for the purpose of the disclosure.

In certain circumstances, we may provide you with opportunities to sign up for certain benefits programs that involve the disclosure of your Personal Information to third party benefits providers. Any such program will be purely optional and based on your opt-in participation.

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased or used;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Sharing and Sale of Personal Information

In the preceding 12 months, we have not shared or sold employment-related Personal Information to third parties as those terms are defined by the CCPA.

We do not collect, process, or disclose sensitive Personal Information, as defined under the CCPA, for purposes other than those specified in Section 7027 of the CCPA regulations.

3. INDIVIDUAL RIGHTS

The CCPA provides residents of California with a series of rights regarding the processing of their Personal Information. This section explains the scope of these rights and outlines how you may exercise them. Some exceptions may apply, we will state in our response if an exception applies.

Consumer Right	Explanation
Right to Know/Access	You may have the right to confirm whether we are processing your personal information, the right to know specific pieces of personal information we have collected about you, to know the categories of personal information we are processing or have processed, and the right to access that data. You also have the right to know the third parties to whom we have disclosed your personal information.

Consumer Right	Explanation
Right of Correction	You may have the right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.
Right of Deletion	You may have the right to delete your personal information provided by you or obtained about you.
Right to Limit	You have the right to request that we limit the use and disclosure of your Sensitive Personal Information to only those purposes specifically authorized under California law. At this time, we do not process or disclose your Sensitive Personal Information for purposes that are not specifically authorized under California law. Should this change, we will notify you and provide you with an opportunity to limit our processing of your Sensitive Personal Information..
Right to Opt-out	<p>You may have the right to opt-out of the processing of your personal information for the purposes of:</p> <ul style="list-style-type: none"> (1) Targeted advertising or sharing; (2) The sale of personal information; and/or (3) Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. <p>At this time, we do not engage in decision-making based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you.</p> <p>We do not sell or share information that we collect or process about you in your capacity as an Employee or Contractor.</p> <p>To the extent you interact with the Company outside of your capacity as an Employee or Contractor, please see our general online Privacy Policy.</p>
Right to Non-Discrimination	You may have the right not to receive discriminatory treatment for exercising the privacy rights conferred by law. We will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your Rights. To exercise your rights, to know/access, correction, deletion, restrict, or portability, as applicable, please email us at privacy@changemtg.com or at 1-833-CHM-0123.

Verification. To ensure the protection of your personal information, we may need to verify that the individual submitting a request is the individual to whom the request relates prior to processing the request, or an authorized agent. To verify a consumer’s identity, we may request up to three pieces of personal information about you to compare against our records when you make a request.

We may require that you access a previously existing account where necessary to submit the request.

We will only use personal information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify the identity of individuals where we have reason to believe a request is fraudulent.

You may choose a person or business that you authorize to act on your behalf to submit your requests (“**Authorized Agent**”). If you choose to use an Authorized Agent, we require that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with us. Failure to do so may result in us denying your request.

Revision Date	Effective Date	Description of Revision	Notes
4.23.2026	4.23.2026	Policy restated	CRO/Board Approved