

# Website Privacy Policy

Last modified: 05/24/23

## **Introduction**

Financial Industry Computer Systems, Inc. (“FICS”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information FICS may collect from you or that you may provide when you visit the website loanproducer.com (referred to as the “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

FICS provides web applications for its mortgage bank, credit union, and bank customers (“Customer”) as a tool available to their customers (“End Users”) to apply for mortgages or review mortgage information.

This policy applies to information we collect with the web applications:

On this Website.

In communications between you and this Website.

It does not apply to information collected by:

Us offline or through any other means, including on any other website operated by FICS or any third party (including FICS Customers); or

Any third party (including FICS Customers), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 16**

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us using the contact information below.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information.

## Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

By which you may be personally identified, such as email address, Social Security number, member number, username, password, loan number, or information you provide by filling in forms on our website (“**personal information**”);

That is about you but individually does not identify you; and/or

About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

Directly from you when you provide it to us.

Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies.

### *Information You Provide to Us*

The information we collect on or through our Website may include:

Information that you provide by filling in forms on our Website.

### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.

Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

Understand our users and usage patterns.

Authenticate End User registration for the web application.

Store information about your preferences, allowing us to customize our Website according to your individual interests.

Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

**Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of

our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

In the preceding twelve months, we have collected and disclosed the following categories of personal information:

Category	Information Collected	Categories of Persons to Whom Information was Disclosed
Personal Information	email address, Social Security number, member number, or loan number	Customers
Internet and usage data	IP address, traffic data, location data, usage logs	Website Services

### **Third-Party Collection of Information**

When the web application is deployed for Customers, the web application temporarily stores and analyzes information that is input into the application by the End User or imported from a third-party credit agency on behalf of the End User. This information is eventually deleted from the web application and stored on the Customers’ platform once the loan application is submitted for approval to the Customer by the End User. Customers maintain sole ownership of this information once received and determine their own policies regarding the storage, access, use, deletion, disclosure, and retention of this information. This information is hosted and stored only on Customer’s servers and not FICS’ servers. This policy addresses only FICS’ use and disclosure of personal information directly collected by FICS. Different rules may apply to the use and disclosure of End Users information by Customers.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

To set up your user account and to present our Website and its contents to you.

To authenticate End Users’ access to the Website.

To provide you with information, products, or services that you request from us.

To fulfill any other purpose for which you provide it.

To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.

To notify you about changes to our Website or any products or services we offer or provide through it.

In any other way we may describe when you provide the information.

For any other purpose with your consent.

We retain the information we collect for as long as needed to provide our services to our Customers and to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Disclosure of Your Information**

We may disclose personal information that we collect, or you provide as described in this privacy policy:

To contractors, service providers, and other third parties we use to fulfill the service for which you provided the information. For example, to request a credit report from a credit bureau or submit your loan application for approval to Fannie Mae or Freddie Mac.

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of FICS's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by FICS about our Website users is among the assets transferred.

To fulfill the purpose for which you provide it. For example, we may provide an End User's information to the Customer that processes the End User's loan application.

For any other purpose disclosed by us when you provide the information.

With your consent.

To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

We do not sell personal information.

### **Accessing, Correcting, or Deleting Your Information**

End Users may review and change login information by logging into the Website and visiting your account profile page. End Users may access and correct loan application data provided by them until the loan application is submitted to Customer.

### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information.

### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at [Privacy@FICS.com](mailto:Privacy@FICS.com).