

Norcom California Consumer Privacy Act Privacy Policy

California Consumer Privacy Act

The California Consumer Protection Act (“CCPA”) provides California residents with certain rights regarding personal information. Personal information does not include information that is publicly available from government records or de-identified or aggregated consumer information.

As a California resident, you have a right to:

- Know about personal information collected, used disclosed, or sold;
- Request deletion of personal information;
- Opt-out of the sale of personal information;
- Non-discrimination for the exercise of your privacy rights under the CCPA.

Each of these rights are described in greater detail below.

Please note that the CCPA does not apply to personal information covered by certain privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Information We Collect

We may have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
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.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal.Civ. Code § 1798.80(e)).	Any information that identifies, relates to, describes, or is capable of being associated with a particular individual, including, but not limited to, 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. Some personal information included in this category may overlap with other categories.	Yes

C. Protected classification characteristics under California or federal law.	Race, color, religion or creed (includes religious dress and grooming practices), sex/gender (including pregnancy, childbirth, breastfeeding, and/or related medical conditions), gender identity, gender expression, sexual orientation, marital status, medical condition, veteran or military status, national origin, citizenship, ancestry, physical or mental disability, genetic information, or Age (over 40).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	An individual's physiological, biological, behavioral, and genetic characteristics, that can be used, singly or in combination with each other or with other identifying data, to establish identify. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

We collect personal information both directly and indirectly from you. We collect personal information directly from you, for example, when you provide us your personal information to obtain a good or service from us. We collect personal information indirectly from you, for example, when we observe your actions on our Website.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with the good or service for which you provided the personal information;
- To detect and prevent security incidents on your account;
- As described to you when originally collected;
- Processing payments;
- Verifying customer information;
- Undertaking internal research to better develop our goods and services and to improve our Website;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and
- Undertaking activities to verify or maintain the quality and selection of our goods and services.

Disclosure of Personal Information for a Business Purpose

In the preceding twelve (12) months, Norcom may have shared the following categories of personal information for a business purpose:

- Identifiers;
- California Consumer Records personal information categories;
- Protected classification characteristics under California or federal law;
- Commercial information;
- Internet or other similar network activity; and
- Professional or employment-related information.

Norcom shares your personal information for a business purpose with its service providers in accordance with this privacy policy.

Right to Know About Personal Information

You have the right to request that Norcom disclose certain information to you about the personal information Norcom has collected and used over the past twelve (12) months. You are permitted to request information regarding the following:

- The categories of personal information we collected about you;
- The categories of sources from which personal information was collected;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you; and
- If we sold or disclosed your personal information for a business purpose:
 - A list of sales, identifying the personal information that each category of purchaser purchased; and
 - A list identifying the personal information categories that we disclosed for a business purpose to our service providers.

Please note that, as stated above, the CCPA does not apply to personal information covered by certain privacy laws; laws that our business is subject to. To the extent that your request is covered by a law that is not subject to the CCPA, we will indicate as much in our response to your verifiable consumer request.

Right to Request Deletion

You have the right to request that Norcom delete the personal information collected by us and our service providers, in some circumstances. Please be aware that exercising this right does not ensure complete or comprehensive removal or deletion of personal information; there may be circumstances in which the law does not require or allow use to fulfil your request.

Sale of Personal Information and Opt-Out Rights

The CCPA gives you the right to opt-out of the sale of your personal information by a business. Norcom does not sell personal information.

Non-Discrimination

Norcom will not discriminate against you for exercising any of your CCPA rights. Unless otherwise permitted by the CCPA, and although not an exhaustive list, we will not do any of the following should you exercise your rights under the CCPA:

- Deny you any goods or services;

- Charge you different prices or rate for goods and services, including through the use of discounts or other benefit, or imposing penalties;
- Provide you with a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services.

Requests

To exercise the rights described above, please submit a request to us using one of the following methods:

- Call: (855) 667-2661;
- Download and complete the CCPA Request Form and email it to compliance@norcom-usa.com;
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Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

You may make a request to exercise your rights under the CCPA twice within a 12-month period. The CCPA requires that we verify that the person making a request to know or a request to delete is the consumer about whom we have collected information, otherwise known as a “verifiable consumer request”.

A verifiable consumer request must provide us with (1) enough information so that we may reasonably verify that you are the person about whom we collected personal information or an authorized representative of the person whom we collected personal information, which may include: your name, address, phone number, email address, your date of birth, and/or the last four digits of your social security number and (2) sufficient detail so that we may respond to your request. During the verification process, we will match the personal information provided with the personal information already maintained by us. We may require additional information from a person making an authorized request on behalf of our consumer, such as signed permission from our consumer granting authorization for the individual to act on our consumer’s behalf.

We only use the information provided to use during the verification process for the purpose of verifying the identity or authority of the person making the request. If Norcom cannot verify your identity or authority to make the request, then Norcom will not respond to your request.

Responding to Requests

Upon the receipt of a request, Norcom will confirm receipt of that request within ten (10) business days and will respond to verifiable consumer requests within forty-five (45) calendar days. If we require additional time to process your verifiable consumer request, you will be notified of the additional time necessary to respond (no more than forty-five (45) additional calendar days), via mail or electronically, as you prefer and indicate in your request. Our response will be in format that is portable and readily useable.

We do not charge a fee for responding to verifiable consumer requests.

Minors

Norcom's goods and services are not directed at minors and we do not knowingly collect personal information from minors under the age of 16. If you learn that a minor has provided us with personal information, you may contact us as indicated below.

Changes to this CCPA Privacy Policy

We reserve the right to make changes to our CCPA Privacy Policy at any time and in our sole discretion. All changes will be posted on our Website and, upon a change, we will update the effective date above. Your continued use of our Website following the posting of changes constitutes your acceptance of the changes.

Contact Information

If you have any questions or concerns about this privacy policy, please do not hesitate to contact us at:

Phone: (855) 667-2661

Email: compliance@norcom-usa.com

Website: www.norcommortgage.com

Address: 38 Security Drive, Avon, CT 06001; Attn.: Compliance Dept.