

Effective Date: June 10, 2024

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This California Notice at Collection and Privacy Policy (“CCPA Disclosure”) explains how Onity Group Inc. and its subsidiaries and affiliates, including PHH Mortgage Corporation and its subsidiaries and affiliates (collectively “PHH”, “us”, “our”, or “we”) collect, use, disclose, and/or retain personal information (“Information Practices”) subject to the California Consumer Privacy Act (“CCPA”). This CCPA Disclosure applies solely to California residents (“consumers” or “you”).

If you are a consumer or customer of personal, household, or family financial products or services, this CCPA Disclosure does not apply to you. Instead, please refer to our [Financial Privacy Notice](#), or other financial privacy notice applicable to our services. If Onity Group Inc. subservices your mortgage loan, please refer to the financial privacy notices for consumers of personal, household or family financial product or services that was provided to you by mail.

Additionally, this CCPA Disclosure does not apply to information we collect from you as a job applicant, employee, contractor, or other role within PHH. Instead, please refer to our [Workforce CCPA Disclosure](#).

Notice at Collection and Privacy Policy for California Residents

Notice at Collection

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used. Please note that most of the information we use is in the context of providing financial products and services and is therefore not subject to the CCPA.

General Personal Information

Categories of Personal Information	Purposes for Collection	Retention Policy
Identifiers: For example, a name, address, Internet Protocol address, email address, or other similar identifiers.	<ul style="list-style-type: none">• To evaluate you for or provide a commercial, investment, or non-personal, family, or household financial product or service• To verify your identity	We retain information for different periods of time depending on the purposes for which we collect and use it. For example, if you have a commercial loan with us, we will retain your information

<p>Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, Social Security number, telephone number, state for federal identification, financial information.</p>	<ul style="list-style-type: none"> • To improve our products and services • To protect against security risks • To conduct research, analytics, or other internal analysis • To conduct business with you or your employer in your role with a third party with whom we do business • To operate, manage, and maintain our business • To perform compliance activities or institutional risk control • To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights • At your direction or with your consent • To comply with all applicable laws and regulations. 	<p>for the life of the loan, plus any applicable legal requirements.</p> <p>We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing of your information.</p>
<p>Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered.</p>	<ul style="list-style-type: none"> • To evaluate you for or provide a commercial, investment, or non-personal, family, or household financial product or service • To verify your identity • To improve our products and services • To protect against security risks • To conduct research, analytics, or other internal analysis 	

	<ul style="list-style-type: none"> • To operate, manage, and maintain our business • To perform compliance activities or institutional risk control • To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights • At your direction or with your consent • To comply with all applicable laws and regulations 	
<p>Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> • To improve our products and services • To protect against security risks • To conduct research, analytics, or other internal analysis • To operate, manage, and maintain our business 	
<p>Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin, age, gender, sexual orientation, medical condition, or veteran status.</p>	<ul style="list-style-type: none"> • To improve our products and services • To protect against security risks • To conduct research, analytics, or other internal analysis • To operate, manage, and maintain our business • To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights 	

We do not collect: Biometric information; geolocation data; sensory or surveillance data; education information; or profile data under this policy.

Sensitive Personal Information

Categories of Sensitive Personal Information	Purposes for Collection	Retention Policy
Social Security Number, Driver’s License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> • To perform services or provide goods you request and reasonably expect from us 	<p>We retain information for different periods of time depending on the purposes for which we collect and use it. For example, if you have a commercial loan with us, we will retain your information for the life of the loan, plus any applicable legal requirements.</p> <p>We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing of your information.</p>
Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • To detect, prevent, and investigate security incidents involving your information • To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible • To ensure the safety of you and others • To perform services for our business needs such as processing payments, providing customer service, and providing financing • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided 	

We do not collect: Precise geolocation; racial or ethnic origin; religious or philosophical beliefs, or union membership; contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication); genetic data; biometric information for the purpose of unique identification; health information; or information concerning sex life or sexual orientation under this Policy.

California Privacy Policy

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our Information Practices. You have certain rights regarding the control and use of your personal information. This privacy policy describes those rights as they relate to our collection and use of your personal information and describes how you can exercise those rights.

Your Right to Know

You have the right to request that we disclose any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about consumers, categories of personal information we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

General Personal Information

Category	In the preceding 12 months this category was:		Categories of third parties to whom the information was disclosed	Business or Commercial Purpose for Collection & Disclosure
	Collected	Disclosed		
Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Government entities • Operating systems and platforms • Credit Reporting Agencies • Vendors providing the following services: <ul style="list-style-type: none"> ○ Cloud storage ○ Payment processing ○ Web hosting ○ Accounting 	<ul style="list-style-type: none"> • For our operational purposes or the operational purposes of our service provider or contractors • To perform services or provide goods you request and reasonably expect from us • To detect, prevent, and investigate security incidents involving your information
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Commercial Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

			<ul style="list-style-type: none"> ○ Cybersecurity ○ Logistics and planning tools ○ Customer relationship management tools ○ Property inspections ○ Valuations ○ Title services ○ Loss mitigation 	<ul style="list-style-type: none"> ● To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible ● To ensure the safety of you and others ● To perform services for our business needs such as processing payments, providing customer service, and providing financing
Characteristics of CA or Federal Protected Classifications. For example, race, religion, national origin, age, gender, sexual orientation, medical condition, or veteran status.	☒	☒	<ul style="list-style-type: none"> ● Government entities ● Operating systems and platforms ● Credit Reporting Agencies ● Vendors providing the following services: <ul style="list-style-type: none"> ○ Cloud storage ○ Customer relationship management tools ○ Loss mitigation 	<ul style="list-style-type: none"> ● To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided

We do not collect: Sensory or Surveillance Data; professional or employment-related information; profile data; education information; biometric information; or geolocation data under this Policy.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

Category	In the preceding 12 months this category was:		Categories of third parties to whom the information was disclosed	Business or Commercial Purpose for Collection & Disclosure
	Collected	Disclosed		
Social Security Number, Driver's	☒	☒	<ul style="list-style-type: none"> ● Government entities 	<ul style="list-style-type: none"> ● To perform services or provide goods you request

License, State Identification Card, or Passport Number			<ul style="list-style-type: none"> • Operating systems and platforms • Credit Reporting Agencies • Vendors providing the following services: <ul style="list-style-type: none"> ○ Cloud storage ○ Payment processing ○ Web hosting ○ Accounting ○ Cybersecurity ○ Logistics and planning tools ○ Customer relationship management tools ○ Property inspections ○ Valuations ○ Title services ○ Loss mitigation 	<p>and reasonably expect from us</p> <ul style="list-style-type: none"> • To detect, prevent, and investigate security incidents involving your information • To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible • To ensure the safety of you and others • To enhance your experience on our website in real time, so long as we do not disclose your information to a third party • To perform services for our business needs such as maintaining accounts, providing customer service, and fulfill orders • To ensure the quality or safety of a product, service, or device • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided
Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Racial or ethnic origin, religious or philosophical beliefs, or union membership	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

We do not collect: Precise geolocation; religious or philosophical beliefs, or union membership; contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication); genetic data, biometric information for the purpose of unique identification; health information; information concerning sex life or sexual orientation under this Policy.

The categories identified as collected in the tables above were collected from the following categories of sources:

- You directly

- Credit Reporting Agencies
- Appraisers
- Insurance Companies
- Employers
- Real Estate Brokers
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms

We do not sell or share personal information for cross-context behavioral advertising. We do not sell or share sensitive personal information.

We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

Your Right to Request Correction of Inaccurate Personal Information

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements. We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

How To Exercise Your Rights – Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information, to correct information, or for deletion.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot

verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You can submit a request through our webform, [which can be found here](#), or by calling us toll free at 1-800-449-8767.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will treat it as if it had been submitted in accordance with our designated methods or we will provide you with information on how to submit the request or remedy any deficiencies.

Your request will be verified by matching the information you provide to information that we have collected.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Please note that, in responding to your request, we are not permitted to disclose or provide you with your 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. However, we will inform you with sufficient particularity that we have collected the type of information without disclosing the actual data.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

Using an Authorized Agent to Submit a Request

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

If you're an authorized agent making a request you must email us at digitalmedia@phh.com and:

1. Provide the power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or
2. Provide proof of signed permission along with a copy of your ID **and** have the consumer e-mail us at this same address to directly confirm with us that they provided you permission to submit the request.

Opt-Out Preference Signals

Some website browsers have an “opt-out preference signal” feature that lets you tell other website and businesses that you do not want to have your online activities tracked. No uniform technology standard for recognizing and implementing opt-out preference signals has been finalized. We do not currently respond to a browser’s opt-out preference signal. We are not aware of, and do not knowingly allow such third parties to track your activity over time on the website.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice’s effective date. Your continued use of our websites following the posting of changes constitutes your acceptance of such changes.

Contact for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: digitalmedia@phh.com (please include Attn: Customer Service in the subject line)

Phone: +1 (877) 726-5793