

Effective Date: June 10, 2024

Last Reviewed/Revised on: June 10, 2024

This Notice at Collection and Privacy Policy (“Privacy Disclosure”) explains how Onity Group Inc. and its subsidiaries and affiliates (“Onity”, “us”, “our”, or “we”) collect, use, disclose, and/or retain personal information (“Information Practices”) subject to the California Consumer Privacy Act (“CCPA”). This Privacy Disclosure applies solely to California residents who interact with us as a job applicant, employee, contractor, or other role within our Company (“workforce” or “you”).

Notice at Collection and Privacy Policy for California Residents

Notice at Collection

The purpose of this Notice at Collection is to provide you with timely notice, at or before the point of collection, about the categories of personal information we collect from you and the purpose for which the personal information will be used.

General Personal Information

Categories of Personal Information	Purposes for Collection	Retention Policy
Identifiers: For example, a real name, address, Internet Protocol address, email address, or other similar identifiers.	<ul style="list-style-type: none">• Comply with all applicable laws and regulations• Recruit and evaluate job applicants and candidates for employment	We retain your information, at minimum, during the time an individual is employed with us, or an applicant is interviewing for a position with Onity. Our retention of your information varies by department and business unit. We retain your information as reasonably necessary and proportionate to the purpose for which each category of information was collected and will be processed. Employment records, or portions thereof, may be deleted when there is no longer a legal, compliance, or business purpose to retain your information. We retain all personal information for at least 2 years and can retain certain information for as long as 10 years, depending on our legal obligations and other circumstances.
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.	<ul style="list-style-type: none">• Conduct background and reference checks• Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training, job performance, and/or other human resource purposes.	
Characteristics of CA or Federal Protected Classifications: For example, race, religion, national, gender, sexual orientation, medical condition, or veteran status.	<ul style="list-style-type: none">• Manage and monitor employee access to company facilities, equipment, and systems.• Conduct internal audits and workplace investigations.	

<p>Professional or Employment-Related Information: For example, compensation, personnel files, and current and past job history.</p>	<ul style="list-style-type: none"> • Investigate potential breaches and enforce compliance with Onity policies and procedures. • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Onity. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Perform workforce and data analytics, and benchmarking. • Administer and maintain operations, including for safety purposes. • Promote employee subject matter expertise. • Exercise or defend the Onity's legitimate business interests and legal rights of its employees. 	
<p>Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding your interaction with an Internet Web site, application on a company-owned device.</p>	<ul style="list-style-type: none"> • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Onity's policies and procedures. 	
<p>Sensory or Surveillance Data: For example, video, electronic, or audio surveillance and monitoring for security purposes. This would include monitoring</p>	<ul style="list-style-type: none"> • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. 	

<p>security badge use and IT login access.</p>	<ul style="list-style-type: none"> • Administer and maintain Onity’s operations, including for safety purposes. • Exercise or defend the legitimate business interests and legal rights of Onity and its employees 	
<p>Profile Data: For example, information about your behavior and aptitudes for hiring, retention, and promotion purposes.</p>	<ul style="list-style-type: none"> • Manage your employment relationship with us, including, for example: training and development, job performance, reviews, promotions, and/or other human resource purposes. 	

We do not collect: Commercial information, biometric information, or geolocation data under this policy.

Sensitive Personal Information

Categories of Sensitive Personal Information	Purposes for Collection	Retention Policy
<p>Social Security Number, Driver’s License, State Identification Card, or Passport Number</p>	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations. 	<p>We retain your information, at minimum, during the time an individual is employed with us or an applicant who is interviewing for a position with Onity. Our retention of your information varies by department and business unit. We retain your information as reasonably necessary and proportionate to the purpose for which each category of information was collected and will be processed. Employment records, or portions thereof may be deleted when there is no longer a legal, compliance, or business purpose to retain your information. We retain all personal information for at least 2 years and can retain certain information for as long as 10 years, depending on our legal obligations and other circumstances.</p>
<p>Account log-in, password, or credentials allowing access to an account</p>	<ul style="list-style-type: none"> • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training, job performance, and/or other human resource purposes. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. 	

	<ul style="list-style-type: none"> • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Administer and maintain the Company's operations, including for safety purposes. • Exercise or defend the legitimate business interests and legal rights of the Company and its employees. 	
Racial or ethnic origin	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. • Exercise or defend the legitimate business interests and legal rights of the Company and its employees. 	

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; or information concerning sex life or sexual orientation.

California Privacy Policy

The purpose of this privacy policy is to provide you with a comprehensive description of our Information Practices. You have certain rights to control the 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.

General Personal Information

Category	In the preceding 12 months this was:		Business or Commercial Purpose for Collection & Disclosure	Categories of Third Parties to whom the Information was Disclosed
	Collected	Disclosed		
Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment • Conduct background and reference checks • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes. • Manage and monitor employee access to company facilities, equipment, and systems. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. 	<p>Onity uses third-party service providers to assist with recruitment and services for applicants and employees including the collection, processing, and validation of Personal Information. For example, Onity uses third-party software to maintain and administer its employee and applicant portals. We do not allow our third-party service providers to use your data for their own purposes. We only permit them to process it for specified purposes and in accordance with our instructions, and they are required to keep it confidential.</p>
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Characteristics of CA or Federal Protected Classifications	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sensory or Surveillance Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Professional or Employment-Related Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Profile Data	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

			<ul style="list-style-type: none"> • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain the Company's operations, including for safety purposes. • To promote our products/services and employee subject matter expertise. • Exercise or defend the legitimate business interests and legal rights of the Company and its employees. 	
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We do not collect: Commercial 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.

Sensitive Personal Information

Categories of Sensitive Personal Information	Purposes for Collection	Categories of Third Parties to whom the Information was Disclosed
Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations. 	Onity uses third-party service providers to assist with

	<ul style="list-style-type: none"> • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Administer and maintain the Company's operations, including for safety purposes. • Exercise or defend the legitimate business interests and legal rights of the Company and its employees 	<p>recruitment and services for applicants and employees including the collection, processing, and validation of Personal Information. For example, Onity uses third-party software to maintain and administer its employee and applicant portals. We do not allow our third-party service providers to use your data for their own purposes. We only permit them to process it for specified purposes and in accordance with our instructions, and they are required to keep it confidential.</p>
<p>Account log-in, password, or credentials allowing access to an account</p>	<ul style="list-style-type: none"> • Manage your employment relationship with us, including, for example: training and development, 	

	<p>emergency contacts, discipline, termination, online employee accounts, and/or other human resource purposes.</p> <ul style="list-style-type: none"> • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Onity policies and procedures. • Administer and maintain Onity's operations, including for safety purposes. • Exercise or defend Onity's legitimate business interests and legal rights of its employees 	
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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.

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

- Information that you provide directly to us.
- Information that you provide passively to us through your use of our sites and services.
- Information from third party sources.

We have not and do not sell or share any of your personal information with third parties for cross-context behavioral advertising. We do not sell or share sensitive personal information.

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

Please note that you may log into the Applicant Portal or the Employee Portal to edit, update, or delete your information, with certain limitations. [Click here to login to the Employee HR Portal](#) or [click here to login to the Careers Portal](#). Once you have logged into your account, you may review your personal information, correct your personal information, or to delete your personal information. Note that there are limitations to what you can edit or delete in your account. [Click here](#) to access the internal HR virtual assistant, Olivia, for additional information regarding how to access and use your employee information to review, correct, or delete your personal information. [Click here](#) for external applicant information on how to review, correct, or delete your personal information.

Or, if you are unable to review, correct, or delete your personal information using your account, or simply prefer this method, you may email us at HRHelpdesk@onitygroup.com.

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.

You may also submit a Verified Consumer Request by calling 888-446-2936 and selecting option 2 for the HR Helpdesk and follow the prompts.

Requests to Know or Delete Information About a Child Under the Age of 13: We accept requests for information regarding minors under the age of 13 if we can determine that such requests were submitted by a parent or guardian.

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. 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 to the Human Resources Department, you must email us at HRHelpdesk@onitygroup.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: retaliate against you, as an employee, applicant for employment, or independent contractor.

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 this page and update the notice's effective date. Your continued use of our website and your Onity accounts 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: HRHelpdesk@onitygroup.com (please list "California Consumer Privacy Act" in the subject line)

Phone: +1 888-446-2936 and selecting option 2 for the HR Helpdesk and follow the prompts