

PRIVACY POLICY

Last Updated: March 1, 2024

First Class Home Mortgage, LLC We pride ourselves on our commitment to protecting your privacy. This Privacy Statement (“Statement”) describes in greater detail the privacy practices of FCHM and its affiliates and subsidiaries, meaning companies related by common ownership or control (“us,” “we,” “our”) responsible for collecting and maintaining certain information about you.

If you have questions or complaints regarding our Privacy Statement or practices, please contact us as detailed under the How to Contact Us heading below.

WHEN THIS PRIVACY STATEMENT APPLIES

If a Service you’re using links to this Privacy Statement, this Statement applies to you. This Privacy Statement applies to our sites, products, and services (collectively, “Services”) that link to this Statement. FCHM is the responsible entity for all Personal Information subject to this Statement.

WHAT WE DO WITH YOUR INFORMATION

We want to be clear about what information we collect and how we use it to deliver our Services to you, improve your financial life, operate our business, and help make our Services useful, more intelligent, and work better for you. Except as detailed below, we do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

a) Types of Information We Collect. In connection with accessing our Services, we may collect information from you that can be used to identify you (“Personal Information”), such as your name, shipping/billing address, email address, phone number, username, and password.

We collect information when you register or open an account, sign in, pay a bill, purchase a Service, call us for support, agree to take part in a beta testing, ask to be placed on our waitlist, respond to one of our ads, or give us feedback. We may also get information from other companies or third parties, or when we may use service providers to supplement the Personal Information you give us to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services.

We may also automatically collect certain usage information when you access our Services (“Usage Data”), such as Internet Protocol (“IP”) addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information obtained from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location services, collect Global Positioning System (“GPS”) location data and/or motion data.

Our Services may change over time and we may introduce new features that may collect new or different types of information.

b) How We Use Your Information. We may use your information, including your Personal Information, for the following purposes:

Account Registration. We may use your name, address, phone number, and email address to register your FCHM Account for certain Services we provide and to communicate important information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current.

Communicate with You and Tell You About Other Services. We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. Please see below under “What You Can Do to Manage Your Privacy” for the choices you have regarding these communications.

To Improve Services and Develop New Services. We will use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of **First Class Home Mortgage Services.**

To Provide Our Services and Operate Our Business. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information.

Customer Service and Technical Support. We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience. We also offer various Internet chat services, for example, to speak with a First Class Home Mortgage, support representative. Internet Chat transmissions are not encrypted so you should not supply more Personal Information that is required to address your specific issue. A transcript of the session may be retained to resolve questions or issues related to our Services.

Feedback. We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

Research, Including Publishing or Sharing Combined Information from Many Users, But Only in a Way that Would Not Allow You or Any Other Person to be Identified. Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third-party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you to be identified.

c) First Class Home Mortgage, is a Service that allows you to sign-in to a variety of Real Estate Services with a single Account. We will collect certain information for security purposes in order to verify your authorized access to an account or to reset your password if you cannot access your account. Some Services may require added security and you may be asked to provide additional information. The email address and password that you use to enroll your First Class Home Mortgage, account are your “login credentials” that you will use to authenticate with our network. We assign a unique identification number to your credentials to track you and your associated information. First Class Home Mortgage does not allow sharing between users or individuals, without your consent.

d) How We Share Your Personal Information. From time to time, we may share your Personal Information with others.

Third Party Service Providers. We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection, and prevention, customer care, or performing analytics.

NMLS Licensees. its ads and landing pages (the “Websites”) to its customers (the “Licensees”). You understand that by using the Websites you consent to provide your Personal Information to the Licensees who will contact you to market their services. **NML# 1843**

Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we’re required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

Protection of First Class Home Mortgage and Others. We may share account information, Personal Information, and Usage Data when we believe it is appropriate to enforce or apply our products’ Terms of Service and other agreements; or protect the rights, property, or safety of First Class Home Mortgage, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Reporting to Credit Bureaus. We may share your information with credit bureaus, consumer reporting agencies, and card associations. Late payments, missed payments, or other defaults on your account may be reflected in your credit report and consumer report. We may also share your information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection.

Information Sharing Between First Class Home Mortgage, Entities. We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law. The disclosures provided in this Privacy Statement apply across all Real Estate Connection entities. Affiliates and subsidiaries generally refer to companies related to us by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to: process your transactions, maintain your accounts, operate our business, facilitate signing on to your First Class Home Mortgage , Account, etc. We will also share your information in order for us to be able to offer our products and services to you. We may also share information about your creditworthiness, your transactions, and experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services.

Sale of Our Business. If we sell, merge, or transfer any part of our business, we may be required to share your information. If so, you will be asked if you’d like to stop receiving promotional information following any change of control.

With your Consent. With your consent, First Class Home mortgage, may rent or sell your Personal Information other than as set out above; however, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

e) Syncing, Linking, Connecting Third Party Services with Your FCHM Service.

We work with other companies or developers to offer you products and services and you may choose to sync, link or connect other third-party services with your Real Estate Connection Service. Sometimes Real Estate Connection may let you know about the service or product, or another company may let you know about a Real Estate Connection service or product. It will be clear who is referring to the service or product, and who is providing the service or product. If you choose to accept these services, providing your consent to either the third party or to us, we may exchange your information, including your Personal Information, as well as information about how you interact with each company's service or product. This exchange of information assists us in maintaining business operations and providing the ongoing service you've requested. By requesting or accepting these products or services, you are permitting us to provide your information, including your Personal Information, to third parties.

WHAT YOU CAN DO TO MANAGE YOUR PRIVACY

You can view and edit information that identifies you online through your FCHM Connection Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us. You do not have a choice regarding our use of cookies and other tracking technologies. Thus if you do not want us to track your use through cookies and other tracking technologies please stop using the website.

a) Managing Marketing Communications from Us. We will endeavor to honor your choices when it comes to receiving marketing communications from us.

You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

Click the "*unsubscribe*" link in the email or newsletter you received.

Adjust your preferences in your Real Estate Connection account settings.

For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service.

Unless you specifically instruct us otherwise as outlined herein, our mobile applications may send push notifications to your mobile device. If you are receiving push notifications and no longer wish to receive these types of communications, you may turn them off at the device level. Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

b) Updating Your Personal Information. In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the “How to Contact Us” section of this statement.

c) Cookies and Similar Tracking Technologies. The following is a high-level summary of our practices and your controls for cookies and other tracking technologies.

In accordance with applicable law, Real Estate Connection and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, “Cookies”). Sometimes this tracking is necessary in order for us to provide you with the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers’ experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.

DATA RETENTION AND YOUR ACCESS RIGHTS

a) Data Retention. In accordance with, and as permitted by applicable law and regulations, we will retain your information as appropriate to render our Services, to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and Real Estate Connection records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

b) Your Access Rights.

If you have created an online account with us and would like to update the Personal Information you have provided to us, you can access your account to view and make changes or corrections to your Personal Information.

If you wish to request access, to limit use, or to limit the disclosure, please contact us at **CS@FirstClassHomeMortgage.com** or the mailing address provided under "How to Contact Us" and please provide the name of the customer who submitted your Personal Information to our services. We will refer your requests to that customer and will support them as needed in responding to your request.

SECURITY OF YOUR INFORMATION

Keeping your Information safe is important to us. We provide reasonable and appropriate security measures in connection with securing Personal Information we collect.

For example, we:

Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully.

Comply with applicable laws and security standards.

Securely transmit your sensitive Personal Information.

Train our staff and require them to safeguard your data.

Transmit, store, protect, and access all cardholder information in compliance with the Payment Card Industry's Data Security Standards.

HOW TO CONTACT US

If you have questions or comments about this Privacy Statement, please contact us. We want your feedback and comments. **801-597-8832**

a) Via E-mail. If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at **CS@FirstClassHomeMortgage.com**

b) Via Direct Mail. **10808 River Front Parkway, Suite 3035 South Jordan, Utah 84095**

CHANGES TO OUR PRIVACY STATEMENTS

From time to time, we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. More information about how we will notify you is below.

If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.

COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION

We do not knowingly collect information from minors. First Class Home mortgage, are intended for and directed to *adults*. Our Services are not directed to *minors*, and we do not knowingly collect Personal Information from minors. You must be over the age of 18 years old.

YOUR CALIFORNIA PRIVACY RIGHTS

We do not share your Personal Information with third parties for their marketing purposes without your consent.