

Privacy Statement

Paragon Mortgage Corporation (“**Paragon**” “**us**,” “**we**” or “**our**”) created this Privacy Statement in order to ensure the confidence of visitors (“**you**” or “**your**”) to paragon-mortgage.com (the “**Site**”) and to demonstrate our commitment to fair information practices and the protection of privacy. This privacy statement has been compiled to better serve those who are concerned with how their personally identifiable information (“**Personal Information**”) is being used online. Please read our privacy statement carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personal Information through the Site.

This Statement applies to information we collect:

- On the Site; and
- From email, text, and other electronic messages between you and the Site.

The Statement does not apply to information collected by:

- Paragon from you offline or through any other means, including on any other website operated by us; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from the Site.

Please read this Statement 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 the Site. By accessing or using the Site, you agree to this Privacy Statement. This Statement may change from time to time. Your continued use the Site after we make changes is deemed to be acceptance of those changes, so please check this Statement periodically for updates.

1. Categories of Personal Information That We Collect.

Personal Information is data that can be used to identify or contact a single person. We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**Personal Information**”). In particular, we have (or have not as indicated) collected the following categories of personal information from individuals within the last twelve months, or anticipate collecting this type of information in the next twelve months:

| Category | Examples | Collected |
|---|---|------------------|
| A. Identifiers. | A real name, online identifier, Internet Protocol address, email address. | Yes |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A 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. | Yes (phone only) |

| | | |
|---|--|-----|
| | (Some personal information included in this category may overlap with other categories). | |
| C. Protected classification characteristics under state or federal law. | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). | No |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | No |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | 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. | No |
| 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 person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No |

More specifically, we collect the following types of information from you from the Site:

- (1) Contact Data which includes your name, telephone number, and email addresses;
- (2) Online Tracking information, which is described below; and
- (3) Your browsing history when logged into our website.

2. How We Collect Personal Information From You.

We collect Personal Information from you when you enter information on our Site, including subscribing to emails lists or newsletters. You directly provide us with most of the data that we collect from you. We collect data and process that data when you:

- (1) Sign up for our email list;
- (2) Submit any form relating to doing business with us; and
- (3) Use or view the Site (see Section 3, below).

3. Other Data We Collect, And How We Collect It.

In addition to Personal Information, we may collect information about your internet connection, the equipment you use to access the Site, and details about your usage of the Site, including your browsing patterns. This information is collected using automatic data collection technologies and may also include:

- Details of your visits to the Site, including traffic data, location data, and other communication data and the resources that you access and use on the Site.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We will retain and evaluate information on your recent visits to our website and how you move around different sections of our Site for analytics purposes to understand how people use our Site so that we can make it more intuitive. We will also keep a record of the articles on our Site that you have clicked on and use that information to target advertising on this Site to you that is relevant to your interests, which we have identified based on articles you have read.

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 the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Site.
- Flash Cookies. Certain features of the Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- Web Beacons. Pages of our Site, and our e-mails, may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Us, for example, to count users who have visited those pages or opened an email

and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

4. Use Of Cookies

a. What Types Of Cookies We Use

Cookies are different depending on each site that you access. Generally speaking, a cookie is information that is stored on your computer or mobile device by the Site. If you would like additional insight into how cookies work, please visit <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>, <https://support.google.com/google-ads/answer/2407785?hl=en>, or <https://support.microsoft.com/en-us/help/260971/description-of-cookies>.

For the purpose of our Site, we use the following types of cookies:

- **Functionality** – we use these cookies so that we recognize you on the Site and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – We uses these cookies to collect information about your visit to the Site, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns and usage activities through the Site.

b. How You Can Manage Your Cookies

Depending on which browser you are using will dictate how to manage your cookies. All standard browsers will allow you to elect to not accept cookies. If you make such a setting within your browser, there is a chance that our Site will not work, or will not work as efficiently as it would if you allowed cookies.

5. How We Store Your Data.

We securely store your data in the WordPress database in the contact form plug-in.

We will keep your Personal Information data for 2 years. This time period is extended for an equal time period every time you provide your data to us, and provide consent to store that data.

Once this 2 years expires without any further renewals from you, we will delete your data.

We will not transfer your Personal Information outside of the United States.

6. How We Use Your Data.

We use Contact Data to contact you when necessary, which may include sending you periodic emails regarding your order or other products or services. We use information obtained from online tracking technologies (including information collected by our third party service providers) for web and email analytics and for marketing and advertising purposes. We may also use your Personal Information to personalize your user experience and allow us to deliver the type of content and product offerings in which you are most interested. We may also use your information for internal purposes, such as auditing,

data analysis, and research to improve our products, services, and customer communications. With your specific consent, we may also use your information for any other identified or stated purpose at the time of that consent.

By using the Site, you consent to receiving electronic communications from us. These electronic communications may include notices about applicable fees and charges, transactional information and other information concerning or related to the Site. These electronic communications are part of your relationship with us and you receive them as part of your use of the Site. You agree that any notices, agreements, disclosures or other communications that we send you electronically will satisfy any legal communication requirements, including that such communications be in writing.

7. Third Party Collection of Personally Identifiable Information.

We approve third parties to collect certain information from the Site for the purpose of integrating those third-party tools with the Site. We utilize or plan to utilize Google Analytics, WordPress plugins: HappyForms, Jetpack and MailPoet for those services.

8. Disclosure of Personal Information to Third Parties

From time to time, and at our sole discretion, we may disclose some or all of your Personal Information for marketing purposes and you may be contacted directly by these third-party vendors.

We may disclose PI that we collect from you or that you provide to us:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- 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 the assets of Paragon, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Paragon about the Site's users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use paragon-mortgage.com/terms and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Paragon, our customers, or others.

We believe that you always have a choice when it comes to how we disclose your personal information. To that end, even if you previously agreed to allow your contact information to be used for marketing, you can always choose to opt out of this marketing at a later date. If you no longer wish for us to share your information with third-party marketing companies and third-party vendors, please contact us at lswanson@paragon-mortgage.com.

For California Residents only: If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or

the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by emailing us at lswanson@paragon-mortgage.com. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by emailing us at lswanson@paragon-mortgage.com. You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

9. Data Protection Rights – EU residents only

This Section 9 of the Privacy Statement only applies to residents of the European Union whom are identified as covered by the GDPR, including those persons identified at <https://gdpr.eu/companies-outside-of-europe/>.

For EU residents, you have the right to be fully aware of all of options to protect your personal data. Each EU resident who is also a user of the Site is entitled to the following:

- a. The right to access – You have the right to request us for copies of your personal data. We may charge you a fee for this service.
- b. The right to rectification – You have the right to request that we correct any information that we control that you believe is inaccurate. You also have the right to request us to complete the information you believe is incomplete.
- c. The right to erasure – You have the right to request that we erase your personal data that we control, under certain conditions.
- d. The right to restrict processing – You have the right to request that we restrict the processing of your personal data that we control, under certain conditions.
- e. The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- f. The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

We have one month from the date of your request to respond to it. Please make your request in writing, and send it to either 1130 East Missouri Ave., Suite 204, Phoenix, AZ 85014 or lswanson@paragon-mortgage.com.

10. Data Privacy Rights – NV, ME, CA, NY Residents Only

a. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- 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 (also called a data portability request).

- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

b. Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.) (for California residents only).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

c. Exercising Access, Data Portability, and Deletion Rights

To exercise your rights to access, data portability, and deletion of your personal information from the Site, you must submit a verifiable consumer request to the Operator by emailing us at lswanson@paragon-mortgage.com.

Only you, or someone legally 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.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

d. Response Timing and Format

We endeavor to respond to a verifiable consumer request within sixty days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

e. Non-Discrimination

We will not discriminate against you for exercising any of your California Consumer Privacy Act of 2018 ("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.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

f. Shine The Light Law (CA Residents only)

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of the Site who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to lswanson@paragon-mortgage.com.

11. Data Security.

Secure Sockets Layer, or SSL, is an encryption technology that provides secure communications over the Internet. It does this by verifying that the server to which you are connected is actually the one it claims to be. It also encrypts all transactions between the parties communicating. Encryption is the scrambling of information as it is transmitted over the Internet to protect your confidentiality. PERSONAL INFORMATION passing between your computer and/or mobile device and many of our services is encrypted. This means that while your information is in transit it is scrambled so that only we can reassemble it in its original text format. We use SSL protocol everywhere within the Site and where practicable in our communications with you.

Unfortunately, transmission of information through the Internet cannot be completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us through the Site. 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 Site.

12. Other Limits to Your Privacy.

We may provide you with links to other websites and may approve other websites to obtain online tracking information from the Site. We are not responsible for the privacy practices or the content of such websites. When you utilize the Site, the information that you disclose, including in any audio instructions, may become public information. We have no control over its use and you should exercise caution when deciding to disclose your personal information.

13. CAN-SPAM Act.

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them.

If at any time you would like to unsubscribe from receiving future emails, you can email us at lswanson@paragon-mortgage.com and we will promptly remove you from ALL correspondence.

14. Updates and Changes to Privacy Statement.

We reserve the right to change, update or modify this Privacy Statement. We will post all privacy changes and, if you have an account with us, we will notify you of any material change in our privacy practices. Any such change, update or modification will be effective immediately upon posting on the Site. We will maintain prior versions of our Privacy Statement which will be available for your review.

15. Contact Information

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

Phone: 602-347-6726

Website: www.paragon-mortgage.com

Email: lswanson@paragon-mortgage.com

Postal Address:

1130 E. Missouri Ave., Suite 204
Phoenix, AZ 85014

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