

# PRIVACY POLICY

Whittaker Gregory Burton is a Sole Proprietorship Licensed in California (“WGB” “Us,” “We,” or “Our”) understands that you expect privacy and security for your information. Your trust and confidence in Us is appreciated. Be assured, We are committed to treating your information responsibly. This Privacy Policy describes the standards We follow in handling your nonpublic information.

## INFORMATION GATHERED

You may choose to provide information about yourself in order to be contacted by Us regarding products and/or services, to receive a response to your question or inquiry. Such information may include the following:

- Your Name
- Your company name
- Contact information including but not limited to phone number and email address
- Business address
- Information about your business
- Other information you choose to provide via a telephone call, letter or e-mail
- Information about your activity and interaction with this site

We may collect the above information via online submission forms, contact fields, telephone calls, emails to Us, letters and documentation provided to Us and your activity on Our website.

Because of the financial nature of Our business, Our websites are not designed for use by children under the age of 13 and those not of legal age to contract. Therefore, We do not knowingly attempt to solicit or receive any information from children. Additionally, We do not have services available for those younger than the legal age to contract and as such does not knowingly attempt to solicit or receive any information from those under the age of 16. We do not sell the personal information of minors.

## HOW INFORMATION IS COLLECTED

The personal information We receive about you is provided: by you directly to Us; online forms you complete; documentation provided; emails and letters you send to Us; phone calls with Us; online contact forms; and your activity on Our websites.

## **MANDATORY AND OPTIONAL INFORMATION**

We identify for you what information is required to fulfill any particular request on Our Website. If you choose not to provide mandatory information, We will not be able to provide you the service you are requesting or fulfill your request.

## **USE**

Primarily, the information you provide will be used to contact you and better understand your question and/or needs. You understand that by submitting your information through this Website you agree to be contacted regardless of registration with any federal, state or local Do Not Call list, Do Not Mail list, or any other comparable list or registry. By providing information to Us through this Website, a telephone call, an e-mail or letter, you authorize WGB to engage in the following uses of your information:

- To improve Our products and services
- To periodically market Our products and services, telemarket Our products and services, and send promotional emails and advertisements
- To contact you
- To improve or enhance this Website and your online experience
- For third-parties promotional or marketing use
- To perform services you request
- To complete any other task requested of Us or necessary to perform the underlying services for which you have contacted Us directly or indirectly

We use the personal information we collect about you for the following business purposes, as permitted by law:

- To verify your identity and to respond to your requests for information.
- To process, provide and communicate with you about products or services you request or obtain from us.
- To service, administer or enforce a product or service you obtain from us.
- To obtain or verify insurance or to process insurance claims as an insured or loss payee.

- To respond to customer complaints.
- For government monitoring and reporting purposes, as required by federal or state law.
- To advertise or offer products, services and promotional campaigns to you.
- In connection with secondary market transactions involving your loan with us, including due diligence and audits.
- To improve your experience with us and our products and services, for example, to conduct customer surveys.
- To apply for and maintain government approvals, for example, for government programs, licenses or certifications.
- To comply with the law or legal process, including a civil, criminal, or regulatory inquiry, investigation or subpoena.
- To cooperate with law enforcement agencies concerning suspected illegal conduct or activity.
- To exercise or defend legal claims.
- As reasonably necessary for our operational purposes, or those of our service providers, such as to perform auditing and quality control; market research; product research and development; detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; debug to identify and repair errors in data or functionality; provide customer service; verify customer information; process payments; obtain warehouse financing and other funding; provide marketing services.
- For any other purposes that we disclose to you before or at the time we collect your personal information.
- For any other purposes that we disclose to you before or at the time we collect your personal information.

## • **Third Parties to Whom We Sell**

We do not sell your personal information to third parties.

## **Third Parties to Whom We Disclose**

We share personal information we collect with the following categories of third parties for business or commercial purposes, as permitted by law:

- **Service Providers** that perform services for us pursuant to a written contract, such real estate appraisers, identity verification services, information verification services, title companies, insurers, closing agents, attorneys, operating systems and platforms, data analysts, marketing services, loan servicers, quality control or compliance auditors, financial institutions, mortgage brokers, accountants, independent public auditors, internet service providers and information technology services.
- **Verification sources** whom we ask to verify information in connection with your loan application, including your current or prior employers, landlords, lenders, banks and financial institutions.
- **Government entities**, including state and federal agencies (1) that supervise or have enforcement authority over us; (2) that verify information in connection with your loan application, such as the IRS or SSA; (3) that provide loan programs, guaranties or insurance, such as the FHA or VA; and (4) law enforcement agencies, such as the FBI or local police.
- **Consumer reporting agencies**, pursuant to the FCRA.
- **Investors**, such as banks, lenders and government-sponsored enterprises, and their agents, in connection with secondary market transactions involving mortgage loans we originate or broker.
- **Insurance companies**, for example, private mortgage insurers, fidelity insurers, flood and real property insurers.
- **Authorized third parties**. Other third parties with whom you ask us to share your personal information

If you do not wish to receive information regarding Our products and services, you may opt-out with any future communications or by sending an Email to [wgbloans@msn.com](mailto:wgbloans@msn.com). Please designate within your opt-out request your email address, name, telephone number as well as from what communications you wish to opt-out. Whittaker Gregory Burton does not sell your personal information to third-parties for their promotional or marketing use without your consent.

## SECURITY

In order to protect your information from unauthorized use and access, We have measures in place directed to safeguarding the information you provide. Such measures include, but are not limited to, the following:

- Implementing policies and procedures to provide protection of your information
- Restricting use of and access to your information to only those employees with a legitimate business need

- Requiring third parties doing business with WGB to comply with applicable privacy and security laws
- Using secured internet connections to gather your information and forward to those who will act upon it

While WGB strives to maintain the highest standards of privacy and security, no data transmission over the Internet or any wired or wireless network can be guaranteed to be 100% secure. We recommend you do not send any confidential information by e-mail or through this Website. If you choose to send confidential information to Us via e-mail or other electronic means, you accept all risk that such information may be intercepted by a third-party.

While We respect and honor privacy preferences as you have expressed, there may be times We need to contact you to inform you of a specific change that may have an impact on your ability to use Our services or other critical non-marketing purposes. We may also contact you to respond to any specific request you may submit.

## **LEGAL DISCLOSURE**

At times, We may be required to disclose your personal information to, including, but not limited to, state and federal agencies, regulatory authorities, attorneys, and/or other parties as a result of a legal obligation, subpoena, or other legal requirement.

## **WEB TECHNOLOGIES**

- A “cookie” is a small file that is assigned by the web server to your computer. The use of cookies allows WGB to identify what information and pages are accessed, information that is then used to improve the Website and your online experience. Assigning a cookie to your computer does not provide WGB access to your computer or any other information contained on your computer and your computer is not harmed by WGB’s use of cookies. Most web browsers afford you the option of modifying your settings to reject cookies should you choose. However, declining cookies may interfere with your ability to take full advantage of the features of this Website.
- Web Usage Date: Our websites may track usage data, including but not limited to, your IP address, your page views and links clicked, your browser type and version, and other aspects of how you interact with Our websites. We utilize this information in the aggregate and on an individual level to better understand how Our website is being used, to improve site offerings, for troubleshooting and other issue resolution purposes. This date may also be utilized to help Us provide coaching and assistance on the various tools the site has to offer and provide you with a more personalized website experience or assist with technical support questions. We may also utilize it to send you specific offers or promotions or for other third-party providers to send you specific offers or promotions. If you do not wish to receive offers or promotions, send an Email to [wgbloans@msn.com](mailto:wgbloans@msn.com). You can also follow the instructions at the bottom of any particular Email from Us to manage your notification preferences. We do not track URLs that you

type into your browser, nor do we obtain any information about your usage across the internet once you leave Our website.

## **SOCIAL MEDIA AND THIRD PARTY LINKS**

We have a presence on various social media outlets in an effort to connect with Our clients, customers and to connect with potential clients. Your activity on third-party websites is governed by the security, policies and terms of use of each third-party website. You might find links to third-party websites on this Website. These websites should have their own privacy policies which you should read and understand before using their site. WGB does not accept any responsibility or liability for their policies or the security of information you submit through their website whatsoever as We have no control over third-party websites. The information posted on or directed on WGB or social media profiles is generally available to the public. To protect your privacy, do not include sensitive personal information or any other information you want to keep private in your social media activity, comments, posts, or responses. Any information shared on WGB's social media pages may be archived independently on, and retention of such information is governed by, the third-party website.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time without notice, but the most current version of the Privacy Policy will always be available to you by clicking the link at the bottom of this Website. By continuing to use the Website and the services available through it, after the date of change to this Privacy Policy, including accessing the Website, you agree and acknowledge acceptance of the Privacy Policy in its most current version.

## **TERMS AND CONDITIONS**

Please see the Terms of Use statement for other details that are applicable to and govern your use of and access to this Website by clicking the link at the bottom of this page.

## **RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD**

You have the right to request We disclose what personal information We collect, use, disclose and sell. We have outlined above the general categories of information collected from you directly, indirectly or received by Us. WGB does not sell your personal information and only discloses to third-parties who are: (i) performing services on behalf of WGB; (2) assisting WGB with another business need or purpose; or (3) assisting you with a requested product or service.

# AGREEMENT

By using this Website, you agree to Our Privacy Policy and to the use of the information We receive and collect as stated herein and in ways We may notify you of in the future. By providing any personal information to this site, you acknowledge that you fully understand and consent to the collection and processing of such information. WGB reserves the right at its discretion to modify this Privacy Policy at any time. Your continued use of this site following the posting of changes to these terms indicates your acknowledge, agreement and acceptance of any changes.

## DISCLAIMER OF WARRANTIES

THE INFORMATION AND MATERIALS CONTAINED IN THIS SITE, INCLUDING TEXT, GRAPHICS, LINKS OR OTHER ITEMS – ARE PROVIDED “AS-IS” AND “AS AVAILABLE” AND WE DOES NOT WARRANT THE ACCURACY, ADEQUACY OR COMPLETENESS OF SUCH INFORMATION AND MATERIALS AND EXPRESSLY DISCLAIMS LIABILITY FOR ERRORS OR OMISSIONS IN THIS INFORMATION AND MATERIALS. NO WARRANTY OF ANY KIND, IMPLIED, EXPRESS OR STATUTORY, INCLUDING, BUT NOT LIMITED TO THE WARRANTIES OF NON-INFRINGEMENT OF THIRD PARTY RIGHTS, TITLE, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND FREEDOM FROM COMPUTER VIRUS, OR OTHER MALWARE, IS GIVEN IN CONJUNCTION WITH SUCH INFORMATION AND MATERIALS. EXCEPT AS SPECIFICALLY PROVIDED IN THIS AGREEMENT OR WHERE THE LAW REQUIRES A DIFFERENT STANDARD, YOU AGREE THAT WHITTAKER GREGORY BURTON IS NOT RESPONSIBLE FOR ANY LOSS, PROPERTY DAMAGE OR BODILY INJURY, WHETHER CAUSED BY ACCESS TO OR USE OF THE SERVICES OR THE SITE.

## LIMITATION OF LIABILITY

ALL INFORMATION AND MATERIALS PROVIDED OR CONTAINED ON THIS WEBSITE ARE INTENDED FOR GENERAL INFORMATIONAL PURPOSES ONLY AND DO NOT CONSTITUTE LEGAL OR OTHER PROFESSIONAL ADVICE OR AN OPINION OF ANY KIND. ALL INFORMATION AND MATERIALS PROVIDED OR CONTAINED ON THIS SITE ARE NOT INTENDED TO BE USED AS A SUBSTITUTE FOR SPECIFIC LEGAL ADVICE OR PROFESSIONAL OPINIONS. IN NO EVENT WILL WHITTAKER GREGORY BURTON BE LIABLE FOR ANY DAMAGES, INCLUDING, WITHOUT LIMITATION: DIRECT OR INDIRECT, SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES, LOSSES OR EXPENSES ARISING IN CONNECTION WITH THIS WEBSITE OR USE THEREOF OR INABILITY TO USE BY ANY PARTY, OR IN CONNECTION WITH ANY FAILURE OF PERFORMANCE, ERROR, OMISSION, INTERRUPTION, DEFECT, DELAY IN OPERATION OR TRANSMISSION, COMPUTER VIRUS OR

LINK OR SYSTEM FAILURE, EVEN IF WHITTAKER GREGORY BURTON, OR REPRESENTATIVES THEREOF ARE ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, LOSSES OR EXPENSES. HYPERLINKS TO OTHER INTERNET RESOURCES ARE AT YOUR OWN RISK; THE CONTENT, ACCURACY, OPINIONS EXPRESSED, AND OTHER LINKS PROVIDED BY THESE RESOURCES ARE NOT INVESTIGATED, VERIFIED, MONITORED OR ENDORSED BY WHITTAKER GREGORY BURTON.

# PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective: January 1, 2020

This Privacy Notice for California Residents is a supplement to Whittaker Gregory Burton which can be found on our website at [www.wgbloans.com](http://www.wgbloans.com) This applies to all visitors, users and other who reside in the State of California (“consumers” or “you”). Whittaker Gregory Burton. has incorporated this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and other applicable laws. The terms defined in the CCPA have the same meaning when used in this notice.

## INFORMATION WE COLLECT

We may 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”) through our website. We may have collected personal information from consumers since January 1, 2020 in the following categories:

Category	Examples (not all will be collected)	Collected
Identifier	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
Personal information categories listed in the California Customer Records	A name, signature, Social Security number, physical characteristics or descriptions, address, telephone number, passport number, driver’s licenses or state identification card number, insurance policy number, education,	Yes

Category	Examples (not all will be collected)	Collected
statute (Cal. Civ. Code § 1798.80 (e))	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.	
Protected classifications characteristics under California or Federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical conditions, 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).	Yes
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
Biometric Information	Genetic, physiological, behavioral, biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, face prints and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns and sleep, health, or exercise data.	No
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application or advertisement.	Yes
Geolocation Data	Physical location or movements.	No
Sensory Data	Audio, electronic, visual, thermal, olfactory or similar information.	No
Professional or employment related information	Current or past job history or performance evaluations.	Yes

Category	Examples (not all will be collected)	Collected
Non-public education information (per the Family Education 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 grade, transcripts, class lists, student schedules, student identification codes, and student financial information or student disciplinary records.	Yes
Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities and aptitudes.	No

**Personal information does not include:**

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA’s scope, such as:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California confidentiality of Medical Information Act (CMIA or clinical trial data;
  - Personal Information covered by certain sector specific privacy laws, including the Fair Credit Report Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

Whittaker Gregory Burton obtains the categories of person information listed above from the following sources:

- Directly from you from forms you complete or products and services you purchase or documents that you provide to complete the loan process.
- Indirectly from you such as our observing your actions on our website.
- Records and copies of your correspondence if you contact us. This would include e-mail addresses.
- Our response to a survey that we might ask you to complete for research purposes.
- From third-party business partners such as social media sites, advertising networks and analytics providers.

**Use of Personal Information**

Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, tracking the usage

of our website. Even if we do not retain information, it still will be transmitted to our servers initially and stored long enough to process.

We also use information that you provide us, including any personal information:

- To give you information on our products and services.
- To provide you with information you've requested regarding our products and services.
- To fulfill any other purpose for which you provide it.
- To provide you notices about your account
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing and collection.
- For any purpose with your consent.

Whittaker Gregory Burton may use personal information for the following business purposes:

- To fulfill the reason you provided the information. For example, inquiring about a loan product that would require us to use your personal information to respond your inquiry. We may save your information to inform you of any new products or services.
- To create, maintain and secure your account with us.
- To process your request for a loan.
- To provide support to your inquiries by validating your personal information.
- To respond to a law enforcement requests as required by applicable law, court order or governmental regulations.
- For research and analysis to improve our website and mobile application.
- To evaluate and analysis the sale or transfer of Whittaker Gregory Burton assets, including but not limited to our servicing portfolio.

### **Sharing Personal Information**

Whittaker Gregory Burton, will disclose your personal information to a third party for a business purpose. We only share that information with the following categories of third parties:

- Service providers.
- Third parties that we partner with to offer loan products and services to you.
- Data Aggregators.

### **Sale of Personal Information**

Whittaker Gregory Burton has not sold personal information since January 1, 2020 which is the effective date of the CCPA.

### **Your California Privacy Rights**

If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
  - a. The categories of personal information about you that we collected.
  - b. The category of sources from which the personal information was collected.
  - c. The purpose for collecting personal information about you.
  - d. The categories of third parties to whom we disclosed personal information about you and the categories of personal information that was disclosed and the purpose for disclosing the personal information about you.
  - e. The specific pieces of personal information we collected about you.
2. Request we delete your personal information, unless the CCPA recognizes and exception.
3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond once we have verified your identity. Requests for specific pieces of personal information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification if identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another person. Additionally, we will not honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer or where the personal information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification number, financial account numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for an additional 45 days in order to process the request, we will provide you with an explanation for the delay.

**How to exercise your rights:**

Complete a Personal Information Request form and either email or print and mail to:

Whittaker Gregory Burton

Compliance

18606 Collins St #1

Tarzana, CA 91356

E-mail:

[wgbloans@msn.com](mailto:wgbloans@msn.com)

If you have questions about this CCPA please call (818)996-5626 and leave a message for Privacy Compliance.