

OPPLOANS CALIFORNIA EMPLOYEE PRIVACY POLICY

The State of California requires that we provide privacy information for individuals that are residents of California. If you are not a resident California, you can disregard this document.

For California residents, here is a summary of what you will learn from this privacy policy:

1. Personal Information We Collect
 - 1.1. Personal Information Does Not Include
 - 1.2. Categories of Personal Information Collected
 - 1.3. How We Obtain Your Personal Information
 - 1.4. How We Use Your Personal Information
 - 1.5. Who We Share Your Personal Information With
 - 1.6. Sale of Personal Information
2. Changes to this California Employee Privacy Policy
3. How to Contact Us

Below is the legal information we are required to share:

This California Employee Privacy Policy supplements the Employee Handbook and governs the personal information collected, used and shared by Opportunity Financial, LLC, including its affiliates, Opportunity Manager, LLC and Opportunity Funding SPE, LLC (collectively, “Opploans,” “we,” “us,” or “our”) and applies to job applicants, employees, owners, directors, officers, and contractors of Opploans who are acting in such a capacity (“employment position”) and who reside in the State of California (“consumers” or “you”). We provide these disclosures to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this California Employee Privacy Policy.

1. PERSONAL INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, or could reasonably be linked, directly or indirectly, with a particular consumer (“personal information”).

1.1. Personal Information Does Not Include

Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA, including:
 - 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 Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994 (DPPA).

1.2. Categories of Personal Information That We Collect

In the last 12 months, we collected the following categories of personal information:

- “Identifiers” such as name, alias, address, unique identifier, internet protocol address, email address, account number, Social Security Number, or government identification number;
- “Other Personal Information” such as name, 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, or medical information. Some personal information included in this category may overlap with other categories;
- “Protected Characteristics” under California or federal law for classifications such as 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, or veteran or military status;
- “Internet or Network Activity” such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement;
- “Professional or Employment Related Information” such as Current or past job history or performance evaluations; and
- “Non-public education information” (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) such as 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.

1.3. How We Obtain Your Personal Information:

Directly from you	You enter or provide us with information in person, online, by email, by phone, by document upload, during COVID-19 return to work procedures For example, when you apply for a job or update your information on file
Directly and indirectly from you based on activity on our website or network	For example, from internet browsing or network usage details collected automatically
From vendors that interact with us in connection with your employment position	For example, credit reporting agencies from which we check your credit in connection with a submitted employment application, vendors that provide background search results, or vendors that assist in protecting you and us from fraud and identity theft

1.4. How We Use Your Personal Information:

We may use or disclose the personal information we collect for one or more of the following purposes:

1. Performing services on our behalf, including but not limited to:
 - a. To fulfill or meet the reason for which the information is provided.
 - b. To provide you with a decision on an employment application.
 - c. To provide you with employment benefits.
 - d. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Auditing related to a current interaction with you.
4. Undertaking activities to verify or maintain the quality of a service or device controlled by us, and to improve, upgrade, or enhance our services.
5. For short-term, transient uses.
6. To reduce the risk of spreading COVID-19 or other diseases in the workplace, including contact tracing as needed or required by law.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

1.5. Who We Share Your Personal Information With:

We may disclose your personal information to a service provider or third party for a business or commercial purpose. When we disclose personal information to a service provider, we enter into a contract that describes the purpose and requires the service provider to both keep personal information confidential and not use it for any purpose except performing the services described in the contract or as allowed under the CCPA. Examples of who we share with include:

- Service providers, including but not limited to payroll processors, companies that provide security services, software companies, expense and travel management systems, consultants, employment assessment, and relocation services.
- Third parties including:
 - With attorneys we share Identifiers, Other Personal Information, Protected Classifications, Internet or Network Activity, Professional or Employment Related Information, Non-public education information;
 - With staffing agencies we share Identifiers, Professional or Employment Related Information, Non-public education information;
 - With insurance providers we share Identifiers;
 - With job posting platforms we share Identifiers; and
 - With regulatory agencies we share identifiers, other personal information, and protected characteristics, and when such sharing involves health information, we maintain an employee's anonymity whenever possible.

1.6. Sale of Personal Information:

We do not sell your personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

2. CHANGES TO THIS CALIFORNIA PRIVACY POLICY

We reserve the right to amend this privacy policy at our discretion and at any time. If we make changes to this privacy policy, we will notify you by email or through a notice via Namely.

3. HOW TO CONTACT US

If you have any questions or comments about this privacy policy, the ways in which we collect and use your personal information, or your rights regarding such use, please do not hesitate to contact us at:

Privacy Support E-Mail:	chammond@opploans.com
Postal Address:	Opploans Attn: Human Resources 130 E Randolph St, Suite 3400 Chicago, IL 60601