### WHAT DOES Angel Oak Home Loans LLC **FACTS** DO WITH YOUR PERSONAL INFORMATION? Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. What? The types of personal information we collect and share depend on the product or service you have with us. This information can include: **Social Security number** and Credit scores and Transaction history **Employment information** and Account balances Income How? All financial companies need to share Customers personal information to run their everyday business. In the section below, we list the reasons financial companies can share their Customers personal information; the reasons Angel Oak Home Loans LLC

chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information   | Does Angel Oak Home Loans LLC share? | Can you limit this sharing? |
|--|--------------------------------------|-----------------------------|
| For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes                                  | No                          |
| For our marketing purposes — to offer our products and services to you   | Yes                                  | Yes                         |
| For joint marketing with other financial companies   | No                                   | No                          |
| For our affiliates' everyday business purposes — information about your transactions and experiences   | No                                   | No                          |
| For our affiliates' everyday business purposes — information about your creditworthiness   | No                                   | No                          |
| For our affiliates to market to you  | No                                   | No                          |
| For nonaffiliates to market to you   | No                                   | No                          |

# • Call 888-596-3040 — our menu will prompt you through your choice(s) or • Visit us online: www.angeloakhomeloans.com Please note: If you are a new customer, we can begin sharing your information 31 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. Call 888-596-3040 or go to www.angeloakhomeloans.com

### Ellie Mae, Inc. Privacy Policy - Affiliate Opt Out

| Who we are   |  |  |
|--|--|--|
| Who is providing this notice?  | Angel Oak Home Loans LLC   |  |
| What we do   |  |  |
| How does Angel Oak Home Loans LLC protect my personal information?                 | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.  |  |
| How does Angel Oak Home Loans LLC collect my personal information?                 | We collect your personal information, for example, when you  • Apply for a loan or  • Give us your contact information or  • Give us your employment history or  • Give us your income information or  • Provide account information  We also collect your personal information from others, such as credit bureaus, affiliates, or other companies  |  |
| Why can't I limit all sharing?   | <ul> <li>Federal law gives you the right to limit only</li> <li>sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing.</li> </ul> |  |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account  |  |
| Definitions  |  |  |
| Affiliates   | Companies related by common ownership or control. They can be financial and nonfinancial companies.  *Angel Oak Capital Advisors, LLC  |  |
| Nonaffiliates  | Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Angel Oak Home Loans LLC does not share with nonaffiliates so they can market to you.   |  |
| Joint marketing  | A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  • Angel Oak Home Loans LLC does not jointly market.  |  |

In this Privacy Policy, the words "our," "us," "we," and "Angel Oak" refer to Angel Oak Companies, LP, a Delaware Limited Partnership and our affiliate entities (including affiliates of our affiliates).

Angel Oak and its affiliates are committed to providing you with financial products and services to meet your needs. Our commitment includes protecting personally identifiable information we obtain about you when you use one of our Websites or become our customer. This Privacy Notice ("Notice") describes how we collect, use and disclose Personal Information. We urge you to read this Privacy Policy so you can understand how Angel Oak collects, protects, uses, and removes your data.

## **OVERVIEW**

Angel Oak collects and uses information in order to provide specific financial products or services ("the Services") to businesses and consumers.

Angel Oak does not use information for any purpose not described herein. If we process data for additional purposes in the future, such purposes shall be consistent with the purposes for which the data was originally collected. Otherwise, we will notify you of new purposes for processing and provide you the opportunity to opt out.

In addition, Angel Oak does not sell or disclose your data to third parties for marketing purposes. The types of third parties to whom disclosures may be made are disclosed in the section of this Policy titled "HOW WE SHARE DATA."

Based on the nature of your relationship with Angel Oak, you may fall into one of the following categories:

- Customer / Investor (including applicants)
- Prospective Customer / Investor (including a website visitor who has completed a website form)
- Website Visitor
- Business Partner

## TYPES OF DATA PROCESSED

The information we collect from you depends on the nature of your relationship with us, as well as whether we are a controller or processor. The information we collect may include:

### **Business Partners:**

Identifiers, such as name, social security number, date of birth, EIN

- Personal information, as defined in the consumer privacy laws, such as contact information and financial information;
- Audio, electronic, and similar information, such as call recordings; Professional or employment-related information, such as work history and prior employer;

### Customers/Applicants/Investors:

- Identifiers, such as name and government-issued identifier (e.g., Social Security number, date of birth, etc.);
- Personal information, as defined in the consumer privacy laws, such as contact information and financial information;
- Characteristics of protected classifications under state or federal law, such as sex and marital status;
- Commercial information, such as transaction information and purchase history;
- Professional or employment-related information, such as work history and prior employer;
   and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

### Prospective Customers/Investors:

- Identifiers, such as name and government-issued identifier (e.g., Social Security number, date of birth, etc.);
- Personal information, as defined in the consumer privacy laws, such as contact information and financial information;
- Commercial information, such as transaction information and purchase history;
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

### Website Visitors:

- Internet or network activity information, such as browsing history and interactions with our website:
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

The categories of sources from whom we collected this Personal Information are:

- Directly from an individual or the individual's representatives
- Service Providers, Consumer Data Resellers and other third parties
- Public Record Sources (Federal, State or Local Government Sources)
- Information from our Affiliates
- Website/Mobile App Activity/Social Media
- Information from Client Directed Third Parties or Institutions representing a Client/Prospect

• Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member)

Collectively, these types of information may be referred to as "Personal Data" herein.

You are not required to share the Personal Data that we request. However, if you choose not to share such information, we will generally be unable to interact with you regarding the Services, or you may be unable to apply for and receive the Services.

Angel Oak will never collect more of your Personal Data than is necessary for the intended purpose of processing that information. If you feel any data collected is not necessary for the intended purpose, please notify our Chief Compliance Officer.

Please see the YOUR PRIVACY RIGHTS section below to learn more about how you can control the information Angel Oak processes about you.

## Use of Personal Information

In the past 12 months, we have used Personal Data to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- 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, providing analytic services, or providing similar services.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Short-term, transient use where the information is not disclosed to a third party and is not used
  to build a profile or otherwise alter an individual consumer's experience outside the current
  interaction, including, but not limited to, the contextual customization of ads shown as part of
  the same interaction.
- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)

For specific uses related to each type of data subject, please see below.

### Business Partner/Investor

We may use information related to business partners for the following purposes:

- Contact you regarding Angel Oak products
- Contact you regarding ongoing business transactions

Angel Oak's use of personal data in this context is based on its legitimate interest to grow its business and complete business transactions.

### **Customers and Applicants**

We may use the information we collect from our customers and their users in connection with the Services we provide for a range of purposes, including to:

- Contact you with solicitations for additional Services;
- Provide, operate and maintain the Services;
- Process and complete transactions, and send related information, including transaction confirmations and statements;
- Manage our customers' use of our Services, respond to inquiries and comments and provide customer service and support;
- Send customers technical alerts, updates, security notifications, and administrative communications;
- Comply with our legal obligations;
- Investigate and prevent fraudulent activities, identity theft, unauthorized access to the Services, and other illegal activities; and
- For any other purposes about which we notify customers and users.

We use your Personal Information in this context based on one of the following lawful bases:

- 1. Our legitimate interest to provide the Services and interact with you regarding the Services
- 2. If you become an Angel Oak customer, certain data will be processed to fulfil the contract we have in place with you
- 3. Our legitimate interest for security purposes (e.g. the prevention and investigation of fraudulent activities)
- 4. Our legitimate interest for marketing purposes

### Website Visitor

We may use information related to website visitors for the following purposes:

- Security purposes
- Placement of advertisements

• Investigate and prevent fraudulent activities, identity theft, unauthorized access to the Services, and other illegal activities

### **Prospective Customer**

We may use information related to a prospective customer for the following purposes:

- Providing automated quotes
- Contacting you regarding your interest in Angel Oak services

We use your Personal Information in this context based on our legitimate interest in providing the Services.

# HOW WE SHARE DATA

Any data you provide may be shared with our affiliates and/or non-affiliated third parties as permitted by law, without obtaining your prior authorization. Such laws do not allow consumers to restrict these disclosures in order to fulfill the purposes described herein.

Angel Oak will not sell your data to third parties for direct marketing purposes.

Analytics and Tracking: On some of our Websites, we also may utilize Google Analytics, a web analysis service provided by Google, to better understand your use of the Website and Services. Google Analytics collects information such as how often users visit the Websites, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Websites, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Websites to contextualize and personalize the ads of its own advertising network.

Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the <u>Google Analytics Terms of Use</u> and the <u>Google Privacy Policy</u>. Google offers an opt-out mechanism for the web available <u>here</u>.

Engaging in corporate transactions. Circumstances may arise where we may buy or sell assets or businesses as part of an asset securitization, sale, merger or change in control of Angel Oak. In such transactions, we may disclose or transfer your information, in accordance with this Privacy Policy, to prospective or actual purchasers or receive your information from sellers. Any entity which buys us or part of our business or our assets will have the right to continue to use the information we have collected and stored, but only in the manner set out in this Privacy Policy.

Complying with law / protecting legal rights. We may be required to disclose your information to comply with applicable laws (including laws outside of your country of residence), regulations, court orders, government and law enforcement requests, including national security or other law enforcement requirements. Additionally, if we reasonably believe that it is necessary or appropriate, we reserve the right to use or disclose your information to allow us to pursue available claims or remedies and protect our legal rights, property or the safety of our employees, users or others, to the extent allowed by applicable law. This includes exchanging information with companies and organizations for the purposes of fraud detection.

Subprocessors. Angel Oak engages with subprocessors and service providers to process Personal Data. Angel Oak has reviewed subprocessor and service provider security policies and appropriate certifications to ensure that the subprocessors and service providers protect Personal Data in accordance with Angel Oak's security and privacy standards. All third party disclosures are to fulfill the purposes described in this policy.

### HOW WE KEEP YOUR INFORMATION SECURE

**ISO 27001/27701:** The security of your personal information is important to us. We have implemented technical, organizational and administrative security measures to protect your information from unauthorized access, disclosure, misuse, alteration, accidental loss or destruction. In addition, we align to the ISO 27001 and ISO 27701 framework.

Angel Oak has developed a comprehensive Information Security Policy to define security requirements for all personal information and preserve the confidentiality, integrity, and availability of personal information. The Information Security Policy, and all associated policies and procedures, are reviewed at least annually.

Technical measures to protect information include data encryption, access controls, and vulnerability management.

Angel Oak defines security and privacy obligations for third party service providers, which providers must adhere to.

### STORAGE AND RETENTION OF YOUR INFORMATION

We will retain your Personal Data for as long as it is necessary to fulfill the purpose for which it was collected, unless regulatory requirements require us to retain it for a longer period. We may also retain cached or archived copies of information provided to us. All data is encrypted in transit and encrypted at rest.

### YOUR PRIVACY RIGHTS

Angel Oak provides the ability for you to exercise certain rights with respect to your personal data. Please be aware that, if you do not allow us to collect your information from you, we will generally be unable to interact with you regarding our services. In addition, your rights with respect to data that is subject to the Graham-Leach-Bliley Act ("GLBA") are limited to the rights described in that Act.

**Your choices.** In accordance with applicable law, you may be entitled to exercise your rights and choices as follows:

- Access and Rectification. If information about you is incorrect, or you would like to access your data, you may contact Angel Oak to request access or correction.
- Opt Out and Erasure. You may opt out of marketing solicitations at any time, as well as request erasure of your personal data provided to us. Please note that data collected for Angel Oak's legitimate interests or the provision of a financial product is not permitted to be erased.
- **Right to Object.** You may object to processing of your Personal Data in cases where Angel Oak relies on its legitimate interests to process your data. Angel Oak has documented its legitimate interests and will provide them to you if you exercise this right. This right shall not apply to data which is subject to the GLBA.
- **Data Portability.** You are entitled to request copies of Personal Data that you have provided to us in a structured, commonly used and machine-readable format and/or request that this information be transmitted to another service provider (where technically feasible).

For California Residents: We will not share your Personal Information and Browsing Information with non-affiliated third parties, except as permitted by California law. Currently, our policy is that we do not recognize "do not track" requests from Internet browsers and similar devices.

For Nevada Residents: You may be placed on our internal Do Not Call List by contacting us via the information set forth at the end of this Privacy Notice. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; email: BCPINFO@ag.state.nv.us.

For Oregon Residents: We will not share your Personal Information and Browsing Information with non-affiliated third parties for marketing purposes, except after you have been informed by us of such sharing and had an opportunity to indicate that you do not want a disclosure made for marketing purposes.

For Vermont Residents: We will not share your Personal Information and Browsing Information with non-affiliated third parties, except as permitted by Vermont law, such as to process your transactions or to maintain your account. In addition, we will not share information about your creditworthiness with our affiliates except with your authorization. For joint marketing in Vermont, we will only disclose your name, contact information and information about your transactions.

# Privacy relating to minors

Angel Oak's services and products are meant for adults and are not intended or designed to attract children under the age of thirteen (13) without permission from a parent or guardian. By providing information to Angel Oak, even by using the Website, you affirm that you are over the age of thirteen (13) and will abide by the terms of this Privacy Notice.

If you believe we have any information from anyone under the age of 13, please contact us.

## UPDATES AND HOW TO CONTACT US

From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements or to reflect any changes in how we process information. Any changes to this Privacy Policy will be effective when we post the revised Privacy Policy on this website. The "Last Updated" section at the top of this Privacy Policy states when this Privacy Policy was last revised and serves as notice of the update. Your use of our services following these changes means you accept the revised Privacy Policy.

### **CONTACT US**

If you believe your Personal Data has been used in a way that is not consistent with this Privacy Policy or your specified preferences, or if you have further questions related to this Privacy Policy, we encourage you to please contact our Privacy Team at the address below or by

emailing: PrivacyRequests@angeloakcompanies.com or by calling toll free at 866-347-1891.