



California Broker Privacy Notice

Personal Information from Brokers that are California Residents

Effective Date: September 1, 2023

Last Reviewed on: August 1, 2023

1. Introduction

This Privacy Notice for Brokers that are California residents (the "**California Broker Privacy Notice**") describes NuBridge Commercial Lending LLC's ("**NuBridge**," "**we**," "**our**," or "**us**") collection and use of Personal Information (as defined below). Subject to the scope described below, this California Broker Privacy Notice applies solely to brokers and correspondents, as well as employees, owners, directors, officers, or independent contractors of brokers and correspondents, who reside in the State of California ("**Consumers**" or "**you**") and sell our lending products and services (a "**Business**"), including when you interact with our websites at www.nubridge.com, lq.nubridge.com and portal.nubridge.com (each, a "**Website**"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the "**CPRA**") and any terms defined in the CPRA have the same meaning when used in this notice.

2. Scope of this California Broker Privacy Notice

This California Broker Privacy Notice applies solely to Personal Information that we collect reflecting written or verbal communications or a transaction between us and you as a Consumer in the context of us conducting due diligence regarding, or providing our lending products or services to or receiving a product or service from you or your Business as one of our authorized brokers or correspondents (a "**Business Relationship**"), and that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device ("**Personal Information**"). However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as described in the CPRA) are not considered Personal Information and this California Broker Privacy Notice does not apply to such information. Such government records that are not considered Personal Information and not subject to this California Broker Privacy Notice may include information such as your broker or business or license registration information available from federal or state agencies or regulators, such as a Secretary of State or the Securities and Exchange Commission.

This California Broker Privacy Notice does not apply to employment-related Personal Information collected from our California-based employees, job applicants, contractors, or similar individuals that have a direct relationship with us ("**Personnel**"). Please contact the human resources department if you are part of our California Personnel and would like additional information about how we process your Personal Information.

This California Broker Privacy Notice also does not apply to Personal Information that we collect (or believe we collect) about you in your individual capacity. For example, if you made a direct application for our lending products and services. Please see our Privacy Notice Addendum for California Residents for information regarding our practices regarding such Personal Information.



This California Broker Privacy Notice also does not apply to certain Personal Information that is excluded from the scope of the CPRA.

3. Information We Collect About You and How We Collect It

As part of our Business Relationships, we may collect, and over the prior twelve (12) months may have collected, the following categories of Personal Information about Consumers:

Personal Information Category	Applicable Pieces of Personal Information Collected
Identifiers.	A real name; alias; work postal address; unique personal identifier (license number and/or broker account number with us); online identifier; Internet Protocol address (if you interact with us through a Website (defined below)); social security number; email address; account name; and other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name; signature; social security number; address; telephone number; license number and/or broker account number with us; employment; and employment history. <i>Some Personal Information included in this category may overlap with other categories.</i>
Commercial information.	Records of property, products, or services purchased (including on behalf of others), obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity.	<i>When you interact with us through a Website:</i> Browsing history; search history; information on a Consumer’s interaction with a website, application, or advertisement.
Geolocation data.	<i>When you interact with us through a Website:</i> IP-based geolocation information that may identify your physical location or movements to a general geographic region (such as town, city, state).
Professional or employment-related information.	Current or past job history.
Sensitive Personal Information	<ul style="list-style-type: none"> • Government identifiers (license number) • <i>When you interact with us through a Website:</i> Complete account access credentials (user names or financial account numbers combined with required access/security code or password)

NuBridge will not collect additional categories of Personal Information without providing you notice. As further described in [To Whom Do We Sell or Share Your Personal Information](#), we do not “sell” any categories of Personal Information for monetary or other valuable consideration and we do not “share” any categories of Personal Information for cross-context behavioral advertising.



4. Sources of Personal Information

We collect Personal Information from various sources, including:

- directly from you when you provide it to us;
- automatically as you navigate through our Websites;
- information that we create about you as part of our Business Relationship; and
- from third parties, for example, your Business or our other business partners.

Information You Provide to Us

We may collect the following types of Personal Information directly from you as part of our Business Relationship: real name, alias, work postal address, unique personal identifier, work email address, work telephone number, title, employer name, employment history, broker license information, and any other identifier by which you may be contacted online or offline.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with a Website, we may use automatic data collection technologies to collect certain Personal Information about your interaction with such Website, including information about your equipment, browsing actions, and patterns. This includes:

- details of your use of our Websites. This may include: browsing history, search history, traffic data, logs, referring/exit pages, date and time of your visit to a Website, error information, clickstream data, and other communication data and the resources that you access, use, or otherwise interact with on the Website;
- your general geographic physical location and movements based on your IP address, which may reveal town, city, and state; and
- information about your computer and internet connection, i.e., your IP address, operating system, and browser type.

The information we collect automatically may include Personal Information or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve and protect our Websites and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences;
- customize our Websites according to your individual interests; and
- speed up your purchases or sales of our lending products and services or other operations on our broker portal; and
- recognize you when you return to a Website.



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. Our Websites may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Websites. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our Websites. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://youronlinechoices.eu>.
- **Session Cookies.** Our use of cookies also includes “session cookies.” Each time you access the Website, a session cookie containing an encrypted, unique identifier is placed on your browser. These session cookies allow us to uniquely identify you when you use the Website and track which pages of the Website you access. Session cookies are required to use the Website.
- **Web Beacons.** Pages of our Website 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 NuBridge, 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).

Details about the automated data collection technologies and specific cookies that we use on the Websites and how they are configured may be found in our [Cookie Policy](#).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications on the Websites are served by a third-party, analytics providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Websites. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about any targeted content or their use of your Personal Information, you should contact the responsible provider directly.

Information We Create About You

We may also create certain information about you. This information may be Personal Information or, when we associate this information with other Personal Information about you, we consider this information to be Personal Information. This Personal Information includes: unique identifiers (such as a broker account number), records of lending products or services obtained or considered, or other consuming histories or tendencies.

Information We Collect from Third Parties



We may collect information from third parties, such as your employer, government entities, and other similar entities who provide us information about your license and standing. This information may be Personal Information or, when we associate this information with other Personal Information about you, we consider this information to be Personal Information. This Personal Information includes: real name, alias, current or prior work postal address, unique personal identifier, work email address, work telephone number, account name, title, employer name, employment history, license number, criminal or other disciplinary history, and citizenship.

5. Purposes for Our Collection of Your Personal Information

We only use your Personal Information as necessary to maintain the Business Relationship, including:

- to provide and personalize our Websites;
- to provide you or your Business with information, products, or services that you request from us;
- to support, develop, troubleshoot, and debug our Websites;
- to create, maintain, customize, and secure your, or your Business', account with us;
- to process your, or your Business', requests, transactions, and payments and prevent transactional fraud;
- to receive notices from you related to our Business Relationship, including to receive statements;
- to provide you with notices about your, or your Business', account with us, including expiration and renewal notices;
- to provide you with support and to respond to your, or your Business, inquiries, including to investigate and address your concerns and monitor and improve our responses;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you or your Business or one of your or your Business' customers and us, including for billing, collection, and accounts payable processing;
- in any other way we may describe when you provide the information;
- to fulfill any other purpose for which you provide it; and
- for any other purpose with your consent.

NuBridge will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

6. Third Parties to Whom Do We Disclose Your Personal Information for Business Purposes

NuBridge may disclose your Personal Information to third parties for one or more business purposes. When we disclose Personal Information to non-affiliated third-parties for a business purpose, we enter a contract that describes the purpose, requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the specific business purposes for which the Personal



Information was disclosed, and requires the recipient to otherwise comply with the requirements of the CPRA.

In the preceding twelve (12) months, NuBridge has disclosed the following categories of Personal Information for one or more of the business purposes described below to the following categories of third parties:

Personal Information Category	Categories of Non-Service Provider and Non-Contractor Third Party Recipients
Identifiers.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge; Internet cookie information recipients, such as analytics services; government entities (to report any loan sold by you and as may be required under applicable law as well as for tax and other similar compliance purposes).
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge; government entities (to report any loan sold by you and as may be required under applicable law as well as for tax and other similar compliance purposes).
Commercial information.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge; government entities (to report any loan sold by you and as may be required under applicable law as well as for tax and other similar compliance purposes).
Internet or other similar network activity.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge; Internet cookie information recipients, such as analytics services.
Geolocation data.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge;
Professional or employment-related information.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge.

Sensitive Personal Information Category	Categories of Third Party Recipients
Government identifiers (broker license numbers)	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge.
Complete account access credentials (user names, account numbers, or card numbers combined with	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge.



required access/security code or password)	
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We disclose your Personal Information to the categories of third parties listed above for the following business purposes:

- Helping to ensure security and integrity of our products, services, and IT infrastructure (including our Websites) to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Performing services on behalf of us, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage/hosting, or providing similar services on behalf of us;
- Providing advertising and marketing services, except for cross-context behavioral advertising, to Consumers;
- Undertaking internal research for technological development and demonstration; and
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

In addition to the above, we may disclose any or all categories of Personal Information to any third-party (including government entities and/or law enforcement entities) as necessary to:

- comply with federal, state, or local laws, or to comply with a court order or subpoena to provide information;
- comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers') believe may violate federal, state, or local law;
- comply with certain government agency requests for emergency access to your Personal Information if you are at risk or danger of death or serious physical injury; or
- exercise or defend legal claims.

7. To Whom Do We Sell or Share Your Personal Information

“Sale” of Your Personal Information for Monetary or Other Valuable Consideration

In the preceding twelve (12) months, NuBridge has not “sold” Personal Information for either monetary or other valuable consideration. We have configured our use of cookies and have entered into contractual obligations with third parties that receive cookie information that is designed to ensure that our use of



cookies are not considered a “sale” and these third parties are considered “service providers” under the CPRA. Details about the automated data collection technologies and specific cookies that we use on the Websites and how they are configured may be found in our [Cookie Policy](#).

“Sharing” of Your Personal Information for Cross-Context Behavioral Advertising

In the preceding twelve (12) months, NuBridge has not “shared” Personal Information for the purpose of cross-context behavioral advertising. We have configured our use of cookies and have entered into contractual obligations with third parties that receive cookie information that is designed to ensure that our use of cookies are not considered a “sharing” and these third parties are considered “service providers” under the CPRA. Details about the automated data collection technologies and specific cookies that we use on the Websites and how they are configured may be found in our [Cookie Policy](#).

Sale of Personal Information of Minors Under the Age of 16

We do not have any actual knowledge that we “sell” the Personal Information of minors under the age of 16 for monetary or other valuable consideration and we do not have any actual knowledge that we “share” such Personal Information for cross-context behavioral advertising without affirmative consent as required by the CPRA.

8. Consumer Data Requests

The CPRA provides California residents with specific rights regarding their Personal Information. This section describes your CPRA rights and explains how to exercise those rights. You may exercise these rights yourself or through your Authorized Agent. For more information on how you or your Authorized Agent can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

- **Right to Know.** You have the right to request that NuBridge disclose certain information to you about our collection and use of your Personal Information over the past 12 months (a “**Right to Know**” Consumer Request). This includes: (a) the categories of Personal Information we have collected about you; (b) the categories of sources from which that Personal Information came from; (c) our purposes for collecting this Personal Information; (d) the categories of third parties with whom we have shared your Personal Information; and (e) if we have “sold” or “shared” or disclosed your Personal Information, a list of categories of third parties to whom we “sold” or “shared” your Personal Information, and a separate list of the categories of third parties to whom we disclosed your Personal Information to. You must specifically describe if you are making a Right to Know request or a Data Portability Request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.
- **Access to Specific Pieces of Information (Data Portability).** You also have the right to request that NuBridge provide you with a copy of the specific pieces of Personal Information that we have collected about you, including any Personal Information that we have created or otherwise received from a third-party about you (a “**Data Portability**” Consumer Request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that



allows you to transmit the Personal Information to another third-party. You must specifically describe if you are making a Right to Know request or a Data Portability request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. We will not disclose any Personal Information that may be subject to an exception under the CPRA, such as your social security number. In general, consider all information related to the provision of products and services by your Business to us or from us to your Business to be subject to the “disproportionate efforts” exception CPRA, even if otherwise deemed “Personal Information” as defined herein. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of personal information that we were unable to disclose and provide you a description of the reason we are unable to disclose it. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.

- **Correction.** You have the right to request that we correct any incorrect Personal Information about you to ensure that it is complete, accurate, and as current as possible. You may review and correct some Personal Information about yourself by logging into a Website and visiting your “Manage Users” page. You may also request that we correct the Personal Information we have about you as described below under [Exercising Your CPRA Privacy Rights](#). In some cases, we may require you to provide reasonable documentation to show that the Personal Information we have about you is incorrect and what the correct Personal Information may be or we may be required to confirm your corrections with your Business. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect or if the Personal Information is subject to another exception under the CPRA.
- **Deletion.** You have the right to request that NuBridge delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see [Exercising Your CPRA Privacy Rights](#)), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include, but are not limited to, if we are required to retain your Personal Information to complete the transaction or provide you the goods and services for which we collected the Personal Information or otherwise perform under our contract with you, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. In some cases, we may only be able to delete your Personal Information upon confirmation from your Business. We may also retain your Personal Information for other internal and lawful uses that are compatible with the context in which we collected it.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (a) deny you (or your Business) goods or services; (b) charge you (or your Business) different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you (or your Business) a different level or quality of goods or services; or (d) suggest that you (or your Business) may receive a different price or rate for goods or services or a different level or quality of goods or services.



Exercising Your CPRA Privacy Rights

To exercise the rights described above, please submit a request (a “**Consumer Request**”) to us by either:

- Calling us at 800-833-4714
- Emailing us at privacy@nubridge.com
- Submitting a form via US mail. This form is available from NuBridge upon request.

If you (or your Authorized Agent) submit a Consumer Request to delete your information online, we will use a two-step process in order to confirm that you want your Personal Information deleted. This process may include verifying your request through your email address on record, calling you on your phone number on record (which may include an automated dialer), sending you a text message and requesting that you text us a confirmation, or by sending you a confirmation through US mail. By making a Consumer Request, you consent to us contacting you in one or more of these ways.

If you fail to make your Consumer Request in accordance with the ways described above, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or your Authorized Agent that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an Authorized Agent, see [Authorized Agents](#) below.

All Consumer Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an Authorized Agent of such a person. This may include:
 - Requesting certain pieces of information about you and/or your interaction with NuBridge and comparing them against information we have already collected about you.
 - Emailing, texting, or otherwise communicating with you through another channel (other than the one you used to submit your request). You hereby consent to our communication through one or more of these methods.
- 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 which Personal Information relates to you or the individual for whom you are making the request as their Authorized Agent.

Making a Consumer Request does not require you to create an account with us. However, we do consider requests made through your password protected account on any of our Websites sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a Consumer Request to verify the requestor’s identity or authority to make the request.



Authorized Agents

You may authorize your agent to exercise your rights under the CPRA on your behalf by registering your agent with the California Secretary of State or by providing them with power of attorney to exercise your rights in accordance with applicable laws (an “**Authorized Agent**”). We may request that your Authorized Agent submit proof of identity and that they have been authorized exercise your rights on your behalf. We may deny a request from your Authorized Agent to exercise your rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

Response Timing and Format

We will confirm our receipt of your Consumer Request within ten (10) business days of its receipt. We will generally process these requests within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days), we will inform you of the reason and extension period in writing.

If you have an account on any of our Websites, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by email, postal mail, or through another online portal.

In response to a Right to Know or Data Portability Consumer Request, we will provide you with all relevant information we have collected or maintained about you on or after January 1, 2022, unless an exception applies. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability Consumer Request, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your Consumer Request unless it is excessive, repetitive, or manifestly unfounded. We reserve the right to consider more than two (2) total Right to Know or Data Portability Consumer Requests (or combination of the two) in a twelve (12) month period to be repetitive and/or excessive and require a fee. If we determine that your Consumer Request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9. Your Choices Regarding our Use and Disclosure of Your Sensitive Personal Information

As further described below, we do not use or disclose your Sensitive Personal Information for any purpose other than the following:

- to perform the services or provide the goods reasonably expected by an average Consumer who requests such goods or services;
- to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that our use of your Personal Information is reasonably necessary and proportionate for such purposes;
- to resist malicious, deceptive, fraudulent, or illegal actions directed at NuBridge and to prosecute those responsible for those actions, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;



- to ensure the safety of natural persons, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- for short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us, provided that the Personal Information is not disclosed to another third-party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us;
- for third parties to perform services on behalf of us, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us; and
- to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

10. Personal Information Retention Periods

We retain all categories of Personal Information for as long as reasonably necessary or until you request that we delete it (whichever is longer). However, we may retain any or all categories of Personal Information when your information is subject to one of the following exceptions:

- when stored in our backup and disaster recovery systems. Your Personal Information will be deleted when the backup media your Personal Information is stored on expires or when our disaster recovery systems are updated;
- when necessary for us to exercise or defend legal claims;
- when necessary to comply with a legal obligation; or
- when necessary to help ensure the security and integrity of our Websites and IT systems.

Your Personal Information will be deleted when we no longer require your Personal Information for any of the above purposes.

11. Changes to This CPRA Privacy Addendum

NuBridge reserves the right to amend this California Broker Privacy Notice at our discretion and at any time. If we make any changes to how we treat our users' Personal Information, we will notify you by email to the email address we have on record and/or through a notice on our Websites' home page. The date this Privacy Notice was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you. **Your continuation of our Business Relationship following the posting of changes constitutes your acceptance of such changes.**



12. Contact Information

If you have any questions or comments about this California Broker Privacy Notice, the ways in which NuBridge collects and uses your information described above and in the [Privacy Notice](#), your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800-833-4714

Website: www.nubridge.com

Email: privacy@nubridge.com

Postal Address: NuBridge Commercial Lending LLC
21680 Gateway Center Drive
Suite 230
Diamond Bar, CA 91765
USA