



NUBRIDGE COMMERCIAL LENDING LLC PRIVACY NOTICE ADDENDUM FOR CALIFORNIA RESIDENTS

Effective Date: September 1, 2023

Last Reviewed on: September 1, 2023

1. Introduction

This Privacy Notice Addendum for California Residents (the “**California Privacy Addendum**”) supplements the information contained in NuBridge Commercial Lending’s Privacy Notice and describes our collection and use of Personal Information (as defined below). This California Privacy Addendum applies solely to natural persons that are borrowers, potential borrowers, guarantors and potential guarantors, as well as visitors, users, and others of <https://www.nubridge.com>, including [lq.nubridge.com](https://www.nubridge.com) and [portal.nubridge.com](https://www.nubridge.com) (collectively, our “**Website**”) who reside in the State of California (“**Consumers**” or “**you**”). 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 Privacy Addendum

This California Privacy Addendum applies to information that we collect on our Websites and through our commercial lending application and services (collectively, our “**Services**”), 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 Privacy Addendum does not apply.

This California Privacy Addendum does not apply to employment-related Personal Information collected from our California-based employees, job applicants, contractors, or similar individuals (“**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 Privacy Addendum also does not apply to Personal Information reflecting a written or verbal business-to-business communication (“**B2B Personal Information**”). Please see our California B2B Privacy Notice for information regarding our practices regarding your B2B Personal Information.

This California Privacy Addendum also does not apply to certain Personal Information that is excluded from the scope of the CPRA, such as the Fair Credit Reporting Act (FCRA), and Personal Information covered by certain sector-specific privacy laws.

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

Depending on the relationship with NuBridge, NuBridge may collect, and over the prior twelve (12) months may have collected, the following categories of Personal Information about Consumers:



Category	Applicable Pieces of Personal Information Collected
Identifiers.	A real name; postal address; unique personal identifier; online identifier; Internet Protocol address; email address; account name; Social Security number; driver’s license number or other government-issued identification; 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; driver’s license or state identification card number or other government issued identification; insurance policy number; employment; employment history; bank account number; financial statements and other financial information. <i>Some Personal Information included in this category may overlap with other categories.</i>
Commercial information.	Records of personal property, products, or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity.	Browsing history; search history; information on a Consumer’s interaction with our Websites, application, or advertisement.
Geolocation data.	IP Based geolocation data. This cannot identify your precise current geolocation, but may identify the general geographic region that you are in when you access our Website, such as town, city, and state.
Professional or employment-related information.	Current or past job history. Salary and other compensation details.
Inferences drawn from other Personal Information	Profile reflecting a person’s preferences; characteristics; psychological trends; predispositions; behavior; attitudes; intelligence; abilities; and aptitudes (such as your ability to pay/repay your loan). This may also include credit scores and other similar information provided by credit reporting agencies.
Sensitive Personal Information (“Sensitive Personal Information”)	<ul style="list-style-type: none"> • Government identifiers (social security; driver’s license; state identification card; or passport number) • Complete account access credentials (user names, financial account numbers, or credit/debit card numbers combined with required access/security code or password)

NuBridge will not collect additional categories of Personal Information without providing you notice. 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 about you from the sources described in our Privacy Notice.



5. Purposes for Our Collection of Your Personal Information

We only use your Personal Information for the purposes described in our Privacy Notice.

We may use, or disclose the Personal Information we collect and, over the prior twelve (12) months, have used or disclosed the Personal Information we have collected, for the purposes described in our Privacy Notice as well as the following additional purposes:

- Short-term, transient use, 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, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of the business or a service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling applications and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or a service provider.

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 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; business partners, such as your loan broker and our finance providers; affiliates, parents, and subsidiary organizations of NuBridge; Internet cookie information recipients, such as analytics and behavioral advertising services; government entities (to report your loan and as may be required under applicable law).
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service Providers; business partners, such as your loan broker and our finance providers; affiliates, parents, and subsidiary organizations of NuBridge; Internet cookie information recipients, such as analytics and behavioral advertising services; government entities (to report your loan and as may be required under applicable law).



Commercial information.	Service Providers; business partners, such as your loan broker and our finance providers; affiliates, parents, and subsidiary organizations of NuBridge; government entities (to report your loan and as may be required under applicable law).
Internet or other similar network activity.	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge; social media companies; Internet cookie information recipients, such as analytics and behavioral advertising services.
Geolocation data.	Service Providers; business partners, such as your loan broker; affiliates, parents, and subsidiary organizations of NuBridge.
Professional or employment-related information.	Service Providers; business partners, such as your loan broker; affiliates, parents, and subsidiary organizations of NuBridge.
Inferences drawn from other Personal Information	Service Providers; business partners, such as your loan broker and our finance providers; affiliates, parents, and subsidiary organizations of NuBridge.

Sensitive Personal Information Category	Categories of Third Party Recipients
Government identifiers (social security, driver's license, state identification card, or passport number)	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge and our finance providers.
Complete account access credentials (account numbers, or card numbers combined with required access/security code)	Service Providers; affiliates, parents, and subsidiary organizations of NuBridge.

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 Website, Services, and IT infrastructure 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.
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us. Our agreements with third parties prohibit your Personal Information from disclosure to another third-party and from using your Personal Information to build a profile about the you or otherwise alter your experience outside your current interaction with us.



- Performing services on behalf of us, including maintaining or servicing accounts, providing customer service, processing or fulfilling applications and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, 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.
- Undertaking activities to verify or maintain the quality of our Website or Services (or other services that are provided or controlled by us), and to improve, upgrade, or enhance the our Websites or Services (or other services that are provided 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 (including any Personal Information of minors under 16) 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 (including any Personal Information of minors under 16) 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 “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.

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. In response to a Data Portability Consumer Request, we will not disclose your social security number, driver’s license number or other government-issued identification number, financial account number, health insurance or medical identification number, or your account password or security question or answers. We will not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information, or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. 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 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. 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. 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 goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you 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. 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:
 - Submitting additional documentation, such as your current address, proof of employment (if the Personal Information in question involves a prior employer), verifying your information against correct information we already have on file, and other similar 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.

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

If you have an account with us, 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 mail or electronically, at your option.

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, which will generally be a CSV file and/or PDF file.



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 to third parties for any purpose other than the following:

- To perform the services (including the Services) reasonably expected by an average Consumer who requests such services (including the 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, nonpersonalized 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 the your experience outside the current interaction with us;
- To perform services on behalf of us, such as maintaining or servicing accounts, providing customer service, processing or fulfilling applications 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 of our Website or Services (or other services that are provided or controlled by us), and to improve, upgrade, or enhance our Website or Services (or other services that are provided or controlled by us).

10. Personal Information Retention Periods

We will keep your 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 Website and IT systems.

Your Personal Information will be deleted upon request 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 Privacy Addendum at our discretion and at any time. When we make changes to this California Privacy Addendum, we will post the updated addendum on the Websites and update the addendum's effective date. **Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.**

12. Contact Information

If you have any questions or comments about this California Privacy Addendum, 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

Websites: www.nubridge.com

Email: privacy@nubridge.com

Postal Address: NuBridge Commercial Lending LLC
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Suite 230
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