

FACTS**WHAT DOES CITADEL SERVICING CORPORATION (“CSC”) 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: <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history • Assets, credit, and employment information 	
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 CSC chooses to share; and whether you can limit this sharing.	
	Reasons we can share your personal information	Does CSC share?
	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
	For our marketing purposes — to offer our products and services to you	Yes
	For joint marketing with other financial companies	Yes
	For our affiliates’ everyday business purposes — information about your transactions and experiences	Yes
	For our affiliates’ everyday business purposes — information about your creditworthiness	Yes
	For our affiliates to market to you	Yes
	For nonaffiliates to market to you	No
	Can you limit this sharing?	No
	Can you limit this sharing?	No
	Can you limit this sharing?	No
	Can you limit this sharing?	Yes
	Can you limit this sharing?	Yes
	Can you limit this sharing?	We do not share
To limit our sharing:	<ul style="list-style-type: none"> • Call (888) 800-7661 (our menu will prompt you through your choices), or • Visit us online: https://citadelservicing.com/privacy-policy/ <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. You can contact us at any time, however, to limit our sharing.</p>	
Questions	Call (888) 800-7661 or go to www.citadelservicing.com or www.acralending.com	

Who we are	
Who is providing this notice?	Citadel Servicing Corporation (d/b/a Acra Lending); Acra Investor Loans LLC; and Property Lender USA LLC
What we do	
How does CSC 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. We also provide training to educate employees about their obligations under this Privacy Notice and compliance with our privacy standards and policies.
How does CSC collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • Apply for a loan or provide your contact information, or • Provide your income or asset information, or • Provide employment or 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?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness, • Affiliates from using your information to market to you, and • Sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law(s).
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account, unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • <i>Our affiliates include Acra Investor Loans LLC and Property Lender USA LLC</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • <i>Nonaffiliates we share with can include financial service providers such as mortgage lenders, title insurance companies, and other insurance companies, and retailers and other consumer service providers.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> • <i>Our joint marketing partners can include financial service providers, lenders, and other consumer service providers.</i>

Other Important Information

California Residents

Under California law, we will not share information we collect about you with our affiliates, except as permitted by you or by law. We will limit sharing with our affiliates to the extent required by California law.

Information We Collect

We may collect information that identifies, relates to, describes, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we may have collected the following categories of personal information from consumers since January 1, 2020, the effective date of the California Consumer Privacy Act of 2018 (the "CCPA").

Categories	Examples (not all will be collected)	Business Purpose	Collected?
A. Identifiers	A real name, alias, postal address, unique personal identifier online identifier Internet Protocol address, email address, account name Social Security number, driver's license number, passport number, or other similar identifiers	To process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus, to offer our products and services to you, and other internal purposes required for regulatory purposes.	YES
B. Personal information categories listed in the Customer Records statute (Cal. Civ. Code § 1798.50(c))	A 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, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Same as above.	YES
C. Protected classification characteristics under California or federal law	Age (40 year 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, veteran or military status, genetic information (including familial genetic information).	Same as above.	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Same as above.	YES
E. Internet or similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Same as above.	YES
F. Geolocation data	Physical location or movements.	Same as above.	YES
G. Professional or employment-related information	Current or past job history or performance evaluation.	Same as above.	YES
H. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Same as above.	YES
I. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitude, intelligence, abilities, and aptitudes.	N/A	NO
J. Biometric information	Genetic, physiological, behavioral, and biological characteristics or activity, patterns used to extract a template or other identifiers or identifying information such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	N/A	NO
K. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	N/A	NO

Other Important Information (cont.)

California Residents (cont.)

Personal information does not include:

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

Additional information concerning your rights under the CCPA, including how to request that we do not sell your information, can be found at <https://citadelservicing.com/ccpa/>.

You may also contact us by calling (888) 800-7661 or sending an email to marketing@acralending.com.

Vermont Residents

We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. Additional information about our privacy policies can be found at <https://citadelservicing.com/privacy-policy/> or by calling (888) 800-7661.

Nevada Residents

We are providing this notice under Nevada law. If you prefer not to receive marketing calls from CSC, you may be placed on our internal Do Not Call List by calling (888) 800-7661, or by sending an email to marketing@acralending.com. For more information, you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, at 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number (702) 486-3132; email: BCPINFO@ag.state.nv.us.

Texas Residents

CONSUMERS WISHING TO FILE A COMPLAINT AGAINST A MORTGAGE BANKER OR A LICENSED RESIDENTIAL MORTGAGE LOAN ORIGINATOR SHOULD COMPLETE AND SEND A COMPLAINT FORM TO THE DEPARTMENT OF SAVINGS AND MORTGAGE LENDING, 2601 NORTH LAMAR, SUITE 201, AUSTIN, TX 78705.

COMPLAINT FORMS AND INSTRUCTIONS MAY BE OBTAINED FROM THE DEPARTMENT'S WEBSITE LOCATED AT WWW.SML.TEXAS.GOV OR OBTAINED FROM THE DEPARTMENT UPON REQUEST BY MAIL AT THE ADDRESS ABOVE OR BY EMAIL AT SMLINFO@SML.TEXAS.GOV. A TOLL-FREE CONSUMER HOTLINE IS AVAILABLE AT (877) 276-5550.

THE DEPARTMENT MAINTAINS A RECOVERY FUND TO MAKE PAYMENTS OF CERTAIN ACTUAL OUT-OF-POCKET DAMAGES SUSTAINED BY BORROWERS CAUSED BY ACTS OF LICENSED RESIDENTIAL MORTGAGE LOAN ORIGINATORS. A WRITTEN APPLICATION FOR REIMBURSEMENT FROM THE RECOVERY FUND MUST BE FILED WITH AND INVESTIGATED BY THE DEPARTMENT PRIOR TO THE PAYMENT OF A CLAIM. FOR MORE INFORMATION ABOUT THE RECOVERY FUND, PLEASE CONSULT THE DEPARTMENT'S WEBSITE AT WWW.SML.TEXAS.GOV.

Alaska, Illinois, Maryland, and North Dakota Residents

Under your state's law, we will not share information we collect about you with nonaffiliated companies or persons except as permitted by law or by you. For example, we may share information with your consent or for the exchange of necessary credit information between us and other financial institutions, or consumer reporting agencies, in the regular course of our business.