



CALIFORNIA CONSUMER PRIVACY ACT POLICY

This **CALIFORNIA CONSUMER PRIVACY ACT POLICY** ("Policy") is provided by GOLD CAPITAL LENDING INC. ("**Gold Capital Lending Inc.**", "GCL", "we," "us," or "our") and supplements our other privacy disclosures contained in our U.S. Consumer Privacy Notice and U.S. Online Privacy Policy. This Policy applies solely to visitors, users, and others who reside in the State of California ("Consumers," "Consumer," or "you"). We adopt this CALIFORNIA CONSUMER PRIVACY POLICY ("Policy") to comply with the California Consumer Privacy Act of 2018 as amended and the California Privacy Rights Act ("CPRA") and the implementing Regulations. Any terms defined in the CCPA have the same meaning when used in this Policy.

PURPOSE

The purpose of this Policy is to comply with California law, and provide you, the California consumer, with a comprehensive description of our online and offline practices regarding collection, use, and disclosure of personal information ("PI") (as defined in the CCPA) and of your rights regarding your personal information.

COVERAGE

The rights and protections contained in the CCPA apply to consumers which are defined as natural persons who are California residents. The rights and protections under the CCPA do not apply to business entities or natural persons who reside outside California, for other than transitory purposes.

YOUR RIGHTS AND CHOICES

Subject to certain exceptions under the law, the CCPA grants you the following rights:

1. The right to know what personal information the business has collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about you;
2. The right to delete personal information that the business has collected from you, subject to certain exceptions;
3. The right to correct inaccurate personal information that a business maintains about you;
4. If the business sells or shares personal information, the right to opt-out of the sale or sharing of their personal information by the business;
5. If the business uses or discloses sensitive personal information for reasons other than those set forth in section 7027, subsection (m) of the Regulation, the right to limit the use or disclosure of sensitive personal information by the business;
6. The right to request the categories of personal information that we disclosed about you for a business purpose;
7. The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

Note: Gold Capital Lending Inc. does NOT "sell" or "share" (as defined in CCPA) consumer information. Additionally, Gold Capital Lending Inc. does NOT use or disclose sensitive personal information for purposes other than those specified in section 7027, subsection (m) of the Regulation.



CALIFORNIA CONSUMER PRIVACY ACT POLICY

To access your rights, please send a Verified Request to: info@goldcaplending.com, call us toll-free at (626) 650-9831, or submit your request through a written request addressed to:

COMPLIANCE DEPARTMENT
 308 S. FIRST AVENUE, SUITE C
 ARCADIA, CA 91006

For more information, please see the SUBMITTING A VERIFIED REQUEST section below.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT:

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (personal information). In the preceding 12 months, **Gold Capital Lending Inc** has collected the following categories of personal information about Consumers:

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	DESCRIPTION (I.E EXAMPLES THAT MIGHT FIT THIS CATEGORY UNDER THE CCPA)	CATEGORIES OF 3RD PARTIES WITH WHOM PERSONAL INFORMATION WAS DISCLOSED
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.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below) Non-Customers: Advertising Networks, Data Analytics Providers, Client Relationship Management Software
B. California Customer Records (per the Cal. Civ. Code § 1798.80(e))	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.	Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below) Non-Customers: Advertising Networks, Data Analytics Providers, Client Relationship Management Software

<p>C. Characteristics of protected classifications under California or federal law</p>	<p>Race, color, religion, sex/gender, marital status, military or veteran status, national origin (including from language use or possession of special driver's license), ancestry, age, familial status, receipt of public assistance, and exercising consumer rights.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>
<p>D. Commercial information</p>	<p>Records of products or services obtained including prior loans obtained, existing assets and outstanding liabilities.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: Advertising Networks, Data Analytics Providers, Client Relationship Management Software</p>
<p>E. Biometric information</p>	<p>Voice recordings as part of call recordings.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>
<p>F. Internet or other electronic network activity information</p>	<p>Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: Advertising Networks, Data Analytics Providers, Client Relationship Management Software</p>
<p>G. Geolocation data</p>	<p>Physical location or movements only as recorded as part of any electronic signature records.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>

<p>H. Audio, electronic, visual, thermal, olfactory, or similar information</p>	<p>Audio, electronic, or similar information, as part of any voice call recordings.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>
<p>I. Professional or employment-related information</p>	<p>Current or past job history or performance evaluations.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>
<p>J. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)</p>		<p>Non-Customers: N/A</p>
<p>K. Inferences</p>	<p>Derivation of information, data, assumptions, conclusions, from facts, evidence or another source of data drawn from any of the information identified above to create a profile about a Consumer reflecting the Consumer's preferences, characteristics, or tendencies with respect to obtaining a mortgage loan.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: Advertising Networks, Data Analytics Providers, Client Relationship Management Software</p>
<p>L. Sensitive personal information</p>	<p>Social security, driver's license, state identification card, or passport number, account log-in, financial account, debit card, or credit card number, precise geolocation. Racial or ethnic origin, contents of mail, email, and text messages.</p>	<p>Existing Customers: Our sharing of these Categories of PI with 3rd parties is covered by GLBA and FCRA exceptions (see EXCEPTIONS to CCPA below)</p> <p>Non-Customers: N/A</p>



EXCEPTIONS TO THE CCPA

Personal information subject to the CCPA does not include:

- Publicly available information that is lawfully made available from government records; and
- De-identified or aggregated consumer information.

In addition, some of the rights granted you in the CCPA do not apply to some of the information we have collected and disclosed in the categories listed above, if it is information:

- o Regarding certain medical information governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- o Involving the collection, maintenance, disclosure, sale, communication, or use of certain personal information bearing on your credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency, by a furnisher of information, and by a user of a consumer report, to the extent such activity is subject to regulation under and authorized by the Fair Credit Reporting Act (FCRA);
- o Regarding certain personal information collected, processed, sold, or disclosed pursuant to the California Financial Information Privacy Act (FIPA), the Gramm-Leach-Bliley Act (GLBA) (see our separate US Consumer Privacy Notice), or the Driver's Privacy Protection Act of 1994.

If you request your rights related to information that is not covered by the CCPA, we will so inform you in our response to your Verified Request.

CATEGORIES OF SOURCES FROM WHICH WE RECEIVE PERSONAL INFORMATION

We obtain the categories of personal information listed above about consumers from the following categories of sources:

- From you or your agent
- Advertising Networks
- Lead Generator Services
- Internet Service Providers
- Client Relationship Management Software
- Data Analytics Providers
- Government Entities
- Operating Systems and Platforms
- Social Networks
- Consumer Reporting Agencies or Consumer Data Resellers
- From other 3rd party service providers with which we contract.

OUR BUSINESS OR COMMERCIAL PURPOSES FOR COLLECTING PERSONAL INFORMATION

We or our service providers use your personal information for our operational purposes, or other notified purposes, of which uses we strive to ensure are reasonably necessary and proportionate to achieve our operational purposes for which we collect your information in the first place, or for which we process your information, or for another operational purpose that is compatible with the context in which we collect your personal information. For example, the following are business purposes for which we collect or share your information:

- Performing services on behalf of Gold Capital Lending Inc. or a Service Provider, including maintaining or servicing accounts, providing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising, or marketing services, providing analytic services, providing support and responding to your inquiries, or providing similar services on behalf of Gold Capital Lending Inc. or a Service Provider;
- Auditing related to a current interaction with a Consumer and concurrent transactions including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, auditing compliance with this specification and other standards;



- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term or transient use, provided that the personal information is not disclosed to another third-party and is not used to build a profile about a Consumer 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;
- Undertaking internal research for technological development and demonstration;
- Carrying out of our obligations and enforcement of our rights arising from any contracts entered into between you and us;
- Responding to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- Evaluation or conducting of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred;
- Any other purpose described to you during collection of your personal information or as otherwise set forth in the CCPA/CPRA; 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 Gold Capital Lending Inc., and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Gold Capital Lending Inc.

CATEGORIES OF THIRD PARTIES WITH WHOM WE DISCLOSE PERSONAL INFORMATION

In order to fulfill our business and commercial purposes, including to fulfill the transaction, service your account, or market our products and services to you, we share personal information with the following categories of third parties with whom we contract:

- Advertising Networks
- Operating Systems and Platforms
- Internet Service Providers
- Law, Consulting or other Professional Practice Firms
- Data Analytics Providers
- Consumer Reporting Agencies or Consumer Data Resellers
- Government Entities
- To other 3rd party service providers with which we contract

RIGHT TO ACCESS AND REQUEST DELETION OF YOUR PERSONAL INFORMATION

The CCPA provides Consumers the right to request, pursuant to a "Verified Request," that Gold Capital Lending Inc. provide access to and/or delete any personal information about the Consumer which Gold Capital Lending Inc. collected from the Consumer, subject to certain exceptions.

This right to request deletion is not absolute and is subject to several restrictions and exemptions. Gold Capital Lending Inc. reserves all rights granted pursuant to the CCPA's exemptions and restrictions relating to the deletion of personal information.

In the event that we receive a "Verified Request" to delete information that is not covered by a restriction or exemption, we will notify you within 45 days and delete your personal information from our records and direct any Service Providers to delete your personal information from its records. In the event that we receive a "Verified Request" to delete information that is covered by a restriction or exemption, we will deny your request and within 45 days provide you a response indicating why it is denied.



SUBMITTING A VERIFIED REQUEST

A Verified Request is a request submitted by a Consumer, or a person registered with the Secretary of State and authorized by the Consumer to act on the Consumer's behalf (Authorized Agent), to exercise rights under the CCPA for which Gold Capital Lending Inc. is able to verify that the identity of the Consumer making the request, or on whose behalf the request is made, is the Consumer about whom we have collected the personal information. You may submit a Verified Request by emailing info@goldcaplending.com or calling us toll-free at (626) 650 - 9831, or through a written request addressed to:

Compliance Department

308 S. First Avenue, Suite C
Arcadia, CA 91006

We will only consider a request to be a "Verified Request" if we can identify you by comparing personal information you provide with personal information contained in our records including name, property address and last four digits of social security number. If you have a loan serviced with us, you may also submit your request through your password protected account. If you do not have an account with us but believe we may still have your personal information, we may require additional methods of verification, including a statement signed under penalty of perjury. We will not use any additional information you provide pursuant to a Verified Request for any purpose other than confirming your identify to fulfil the Verified Request.

You may only make a request for personal information from us twice in a 12-month period. We will respond within 45 days of receiving the request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary with notice to you of the extension within the first 45-day period. The disclosure required pursuant to a "Verified Request" shall only cover the 12-month period preceding our receipt of the "Verified Request" and shall be made in writing and delivered to you either by mail or electronically at your option. We are not obligated to provide information to you or your Authorized Agent if we cannot verify your identity, or if we cannot verify that the person making a request on your behalf is authorized by you to do so.

AUTHORIZED AGENTS

You may use an agent that you have authorized to act on your behalf to make a CCPA request on your behalf. However, we will require you, as the consumer on behalf of whom such request is made, to verify your own identity directly with us and to provide proof that the agent has been authorized to submit the request on your behalf. Alternatively, you or the authorized agent can provide proof that the agent has a power of attorney pursuant to Probate Code sections 4121 to 4130.

WHERE RIGHT TO DELETE DOES NOT APPLY

We may deny your deletion request if we cannot verify your identity, we cannot verify the authorization of your agent, if the information was not collected from you or is otherwise not subject to the rights granted by the CCPA (see EXCEPTIONS TO THE CCPA above), or, if retaining the information is necessary for us or our Service Providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Additionally, we will utilize the aforementioned criteria to determine the appropriate retention period for each category of personal information.

SALE/SHARING OF PERSONAL INFORMATION

Gold Capital Lending Inc. does not "sell" or "share" (as defined in CCPA) consumer information nor have we sold your personal information in the preceding 12 months outside of the permitted sharing, disclosures, or transfers made pursuant to the exemptions of the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act.

PERSONAL INFORMATION ABOUT MINORS

We do not knowingly collect or disclose the personal information of minors under the age of 16 without affirmative authorization, nor does Gold Capital Lending Inc. have knowledge that we sell or share the personal information of minors less than the age of 16. Our goldcaplending.com websites are intended only for those persons with legal capacity to contract for a loan. We do not knowingly collect personally identifiable data from persons less than the age of 16, and we strive to comply with the provisions of COPPA (The Children's Online Privacy Protection Act). If you are a parent or legal guardian and think your child less than 16 has provided us with information, please contact us at info@goldcaplending.com. You can also write to us at the address listed at the end of this website Policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line at <https://consumer.ftc.gov/articles/protecting-your-childs-privacy-online> to view the FTC's guide to protecting your child's privacy online.

YOUR RIGHT NOT TO BE DISCRIMINATED AGAINST

The CCPA prohibits Gold Capital Lending Inc. from discriminating against a Consumer because the Consumer exercised any of the Consumer's rights under the CCPA including, but not limited to:

- A. Denying goods or services to the Consumer;
- B. Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- C. Providing different level or quality of goods or services to the Consumer;
- D. Suggesting that the Consumer will receive a different price or rate for goods or services or different level of goods or services.

However, Gold Capital Lending Inc. shall be permitted to charge you a different price or rate, or provide a different level or quality of good or service to you, if that difference is reasonably related to the value provided to us by your data, should you elect to participate in any financial incentive program as we may offer from time to time, and only after we clearly describe the material terms of the financial incentive program. We will not use financial incentive programs that are unjust, unreasonable, coercive, or usurious.



CHANGES TO OUR CALIFORNIA CONSUMER PRIVACY POLICY

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will notify you by email or through a notice on our website homepage.

CONTACT US

If you have any questions, comments, or concerns regarding our California Consumer Privacy Policy and/or practices with respect to personal information, please send an email to info@goldcaplending.com, call us toll-free at (626) 650-9831, or submit your request through a written request addressed to:

Compliance Department

308 S. First Avenue, Suite C
Arcadia, CA 91006