

# Privacy Policy

## Introduction

This Privacy Policy, in conjunction with our Privacy Notice, explains how Eagle Home Mortgage, LLC (“Eagle,” “we,” “us,” or “our”) collect, use and disclose personal information about visitors to our websites, people we meet in person or by phone, our customers and prospective customers (each, “Consumer”, “you,” or “your”), and others whose personal information we collect and retain.

This Privacy Policy applies to:

- Eaglehm.com and any mobile application provided by or on behalf of Eagle (collectively, our “Online Services”); and
- Information we receive and collect through email and other electronic means, off-line communications and in-person contacts.

Eagle Affiliates is defined in our [Privacy Notice](#).

Please note that this Privacy Policy, together with our Privacy Notice and [Terms and Conditions](#), supersede the Privacy Policy, Terms and Conditions and Legal Disclaimers for Eagle’s indirect parent company, Lennar Corporation, as published on [www.lennar.com](http://www.lennar.com).

By using our Online Services or providing your personal information to us after receiving a copy of this Privacy Policy, you are giving your consent to the provisions of this Privacy Policy, our Privacy Notice and our Terms and Conditions.

## Personal Information We Collect

### *What is Personal Information?*

The term “personal information” as used in this Privacy Policy refers to information that identifies you as an individual or relates to you as an identifiable individual. We collect your personal information when, for example, you use our Online Services, engage in an Eagle transaction, communicate with us by email or telephone, and when you visit one of our branches; we also obtain personal information from Eagle affiliates to the extent you consent to such disclosure.

### *Personal Information We Collect*

We collect information described in our Privacy Notice, in compliance with the Gramm-Leach-Bliley Act of 1999 and its implementing regulations (“GLBA”).

### *Information Collected about Your Online Activities*

When you visit our Online Services, we automatically collect and store data using cookies and other online technologies. These data include:

- *Identification* - prior visits to the Online Service, your username and password to access to your Eagle Account and other personalized services.
- *Device* - your IP address, browser type, operating system and other usage information about the use of our Online Services.
- *Usage* - browsing history, search history, and information regarding your interactions with our Websites and other websites, applications, or advertisements.
- *Location information* - your IP address or mobile device identification transmits general information about your geolocation, and you may allow us to obtain more specific geolocation information.

Although the data points collected this way may not specifically identify you, they can be combined with other information about your internet activities to identify your interests and preferences. The information from many separate websites is aggregated by third parties such as Google Analytics and Google Ads and used for data analytics, marketing, and interest-based advertising. For more information about these technologies, how they function, why we use them, and how you can restrict them, see the section titled “[How You Can Limit Cookies and Interest-Based Advertising](#).”

## How We Use Personal Information

Eagle collects and uses your personal information for the business and commercial purposes summarized below, but our use of your information is subject to the following limitations:

- The terms of this Privacy Policy;
- The terms of our Privacy Notice;
- Any specific terms applicable to the services or products you request;
- Your instructions to us that limit the use of certain information when you exercise an “opt-in” or “opt-out” or “unsubscribe” option we provide; and
- The requirements of applicable law.

Subject to those limitations, including as expressly noted in our Privacy Notice, Eagle may use your personal information in the following ways:

1. Establish, maintain and service our customer accounts, provide customer service, process and or fulfill requests for information, contracts, orders and other transactions, verify customer information, provide financing, title, insurance or other home purchase related services through Eagle Affiliates, engage in advertising, marketing, and online analytic services.
2. Process payment information for transactions with Eagle (although we will not retain your credit card information).
3. Build long-term customer relationships by communicating and working closely throughout the contracting, planning, financing, and completion of a project, requesting feedback on the customer's experience, and offering products and services in the future.
4. Maintain records of our customers' needs, preferences and interests so that we may assist customers to identify properties and services provided by Eagle and letting them know about services or promotions that may be of interest to them (which may in some cases be provided by Eagle Affiliates), including by email, mail, telephone, or SMS text message. These are marketing messages and you are able to control whether you receive them. For more information on how you can choose to stop receiving some or all of these messages, please refer to our Privacy Notice.
5. Undertake activities to maintain the quality of Eagle products and services and to improve, upgrade, and enhance those products and services including research and development.
6. Manage our Online Services to maintain functionality, assess our users' feedback so that we present information on your computer or mobile device in a user-friendly way, and to detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity and take appropriate action if needed.
7. Manage our contractual relations, protect our business interests, enforce our terms and conditions and comply with applicable law by monitoring, investigating, and taking other actions to detect and prevent illegal or fraudulent activities and risks to the personal safety of any individual.
8. Comply with valid legal process and respond to appropriate governmental requests.
9. When necessary, aggregate and de-identify personal information so that it is no longer reasonably associated with an identified or identifiable natural person and may then be used for any lawful purpose.

Except as otherwise specifically provided in this Privacy Policy or as required by law, any communication or material you provide to us, whether received online, electronically, in person or otherwise collected by or submitted to us, including any data, questions, comments, suggestions or the like, is, and will be treated as, non-proprietary and may be used for any purpose, including, but not limited to, reproduction, disclosure, transmission, publication, market research, development of prospect lists, project planning, broadcast, posting and marketing, among other things.

## **How We Use and How You Can Limit Cookies and Interest-Based Advertising**

### ***Data Analytics***

We use cookies and similar technologies on our Online Services to obtain information about how our Online Services are used and to analyze visiting patterns. These technologies support some of the features of our Online Services including maintaining your Eagle account login information between visits. The use of cookies and similar technologies for mobile applications also allows us to recognize your IP address or mobile application identifier, measure activity and usage such as the time and length of your visit, the pages you look at, the site you visited just before coming to ours, and the name of your Internet service provider.

We obtain usage and activity data from Eagle Affiliates that operate separate websites and from third parties that host or manage certain features of our Online Services. Each of these companies has its own policies on the collection and use of data collected using cookies and other internet technologies.

We may engage third parties, such as Google Analytics, to collect activity and usage data. Eagle does not disclose any directly identifying personal information to a third-party data analytics provider. However, the provider may monitor a user's interactions with our Online Services and combine this data with data from other websites monitored by the same service provider and then use these findings for its own business and commercial purposes. The provider may have means of correlating data from our Website to an identifiable individual, in which case the processing of personal information will be the responsibility of the service provider.

To learn more about how Google collects, and processes data and the choices Google may offer to control these activities, you may visit: <http://www.google.com/intl/en/policies/privacy/partners/>.

You may also be able to limit data collection by using your browser or mobile device settings. Please note that electing to limit interest-based advertising will not stop all advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests. Additionally, please note that if you use a different browser or erase cookies from your browser, or use a different device, you may need to renew your setting selections.

## **Former Customers**

Our Privacy Policy for sharing personal information about former customers is the same as our Privacy Policy for current customers.

## **How to Contact Us**

If you have any questions about this Privacy Policy, or you want to obtain more information about Eagle's privacy practices, please contact us:

By email: ComplianceTeam@EagleHM.com

By U.S. Postal Mail: 730 N.W. 107th Ave., 4th Floor, Miami, FL 33172 (Attn: Compliance Dept.)

By phone: (888) 966-8262

## **Changes to Our Privacy Policy**

Eagle may at any time revise our Privacy Policy, Privacy Notice or Terms of Use. When we do, we will post the revised Policy on this page with a new "Last Updated" date. You are bound by any such revisions and should therefore periodically visit our Online Services to review the then current terms and conditions, privacy policy and terms and conditions to which you are bound.

***Last Updated: January 1, 2020***

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**Notice for California Residents Only**

Eagle collects consumer personal information from California residents and this disclosure provides additional information on how we collect, use, and disclose personal information relating to California residents covered by the California Consumer Privacy Act of 2018 (“CCPA”). This notice is provided pursuant to the CCPA.

Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. **The CCPA, however, does not apply to certain information, such as information subject to GLBA.**

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. **Please note that this disclosure does not apply with respect to information that we collect about California residents who apply for or obtain a loan from or through us. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our Privacy Notice.**

Consistent with our obligations under applicable laws and regulations, such as GLBA, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

**Collection and Disclosure of Personal Information**

In the past 12 months, we have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

<i>General Category</i>	<i>Examples</i>
Identifiers	Name; Government-Issued Identifying Data (e.g., Social Security number)
Personal Information (as defined under CCPA)	Contact Information; Financial Information
Protected Characteristics	Gender; Marital Status
Commercial Information	Transaction Information
On-line/Internet Activity	Browsing History; Activity on our website
Geolocation	Device location; Internet Protocol location
Professional/Employment Data	Work history; Prior employer
Education	Student records
Personal Information Inferences	Individual preferences and characteristics

The categories of sources from whom we collected Personal Information and the categories of third parties to whom we disclosed Personal Information for our business purposes described in this privacy disclosure are:

<i>Potential Sources</i>	<i>Potential Recipients</i>
Directly from California resident or his/her representative	Affiliates of Eagle Home Mortgage, LLC
Service providers; credit reporting agencies; third parties authorized to provide or sell consumer data	Vendors and service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, IT and related infrastructure, customer service, email delivery, auditing, marketing and marketing research activities
Public records	Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal or tax advice, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers
Eagle Affiliates	Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services
On-line Activity	Governmental authorities as required by laws and regulations
Third Party identified by California resident or otherwise disclosed as part above channels (e.g., former colleague)	

### ***Use of Personal Information***

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

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

### ***Sale of Personal Information***

In the past 12 months, we have not "sold" Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, "sold" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

### ***Rights under the CCPA***

If you are a California resident, you have the right to:

- (1) Request we disclose to you free of charge the following information covering the 12 months preceding your request:
  - the categories of Personal Information about you that we collected;
  - the categories of sources from which the Personal Information was collected;
  - the purpose for collecting Personal Information about you;
  - the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - the specific pieces of Personal Information we collected about you;
- (2) Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
- (3) Be free from unlawful discrimination for exercising your rights under the CCPA

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

***How to Exercise Your Rights***

If you are a California resident, you may submit a request by:

- (1) Emailing [ComplianceTeam@EagleHM.com](mailto:ComplianceTeam@EagleHM.com)
- (2) Calling (888) 966-8262

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