



California Consumer Privacy Act (CCPA) Policy StanCorp Mortgage Investors, LLC

The Standard is committed to maintaining and protecting the confidentiality of your personal information. This CCPA Policy applies to customers of StanCorp Mortgage Investors, LLC (“we,” “us,” or “our”) who reside in the State of California. It explains how we obtain, use and disclose personal information and what are your privacy rights to your personal information under the CCPA.

This CCPA Policy does not apply to personal information covered by other California privacy laws such as the California Financial Information Privacy Act, and federal privacy laws such as the Gramm-Leach-Bliley Act and the Health Insurance Portability and Accountability Act. To understand your privacy rights and how The Standard uses and discloses personal information under these other laws, please review The Standard’s Privacy Notice and HIPAA Notice, which can be accessed at standard.com/about-standard/legal-privacy.

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 device (“personal information”). Within the last 12 months, we may have collected the following categories of personal information either directly or indirectly from our customers or their agents or from third parties that interact with us:

Category	Examples of Personal Information Collected	Collected
A. Identifiers.	Name, alias, postal address, email address, Social Security number, driver’s license number or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, Social Security number, address, telephone number, driver’s license or state identification card number, education, employment, employment history, bank account number or any other financial information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), national origin, citizenship, marital status, sex, veteran or military status.	YES
D. Commercial information.	Records of personal property.	YES
E. Biometric information.		NO
F. Internet or other similar network activity.		NO
G. Geolocation data.		NO

Category	Examples of Personal Information Collected	Collected
H. Sensory data.	Voice recordings from voicemail or other recorded calls.	YES
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights & Privacy Act) (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)		NO
K. Inferences drawn from other personal information.		NO

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quote or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide you with information, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- To evaluate or conduct 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.
- For any other purpose allowed by law.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party to perform business services on our behalf. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the identified services under the contract. For further information on how your personal information may be shared, see [standard.com/about-standard/legal-privacy](https://www.standard.com/about-standard/legal-privacy).

In the preceding 12 months, we may have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category C: Protected classification characteristics under California or federal law

Category D: Commercial information

Category I: Professional or employment-related information

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates and business partners who take part in the services we offer
- Service providers
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you

In the preceding 12 months, we have not sold any personal information.

CCPA Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list of the disclosures made identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- 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, specifically if you previously provided informed consent and deleting that information may seriously impair or render impossible the research's achievement.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of personal information that are compatible with the context in which you provided it.

Exercising Access, Data Portability and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 833-240-6610
- Visiting [standard.com](https://www.standard.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- 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 the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will try our best to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 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. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, 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 and should allow you to further transmit information if you desire.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Based solely on the exercise of your CCPA rights, we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

Changes to Our CCPA Policy

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

Contact Information

If you are a customer of StanCorp Mortgage Investors, LLC and have questions or comments about this CCPA Policy or wish to exercise your rights under California law, please do not hesitate to [contact us](#).

The Standard is the marketing name for StanCorp Financial Group, Inc. and subsidiaries including StanCorp Mortgage Investors, LLC.