SYMMETRY PRIVACY NOTICE

Last Updated: 11/01/2026

Welcome to Symmetry. This Privacy Notice explains how Symmetry Holdco, LLC, including our subsidiaries, Symmetry Lending, LLC and Symmetry Auto Finance, LLC (collectively referred to as "**Symmetry**", "**Symmetry Lending**", "**we**", "**us**", or "**our**") collects, uses, discloses, and otherwise processes personal data in connection with our websites, as well as any specific product, service, or application that references or links to this Privacy Notice.

We may also choose or be required by law to provide different or additional disclosures relating to the processing of personal data about residents of certain countries, regions, or states. Please refer to the Region-Specific Disclosures section below for additional disclosures that may be applicable to you.

This Privacy Notice does not address our privacy practices relating to Symmetry job applicants, employees and other employment-related individuals. This Privacy Notice also does not address data that is not subject to applicable data protection laws (such as deidentified or publicly available information).

This Privacy Notice is not a contract and does not create any legal rights or obligations not otherwise provided by law.

Our Role in Processing Personal Data

Data protection laws sometimes differentiate between "controllers" and "processors" of personal data. A "controller" determines the purposes and means (the why and how) of processing personal data. A "processor," which is sometimes referred to as a "service provider," processes personal data on behalf of a controller subject to the controller's instructions.

This Privacy Notice describes our privacy practices where we are acting as the controller of personal data. However, this Privacy Notice does not cover or address how our customers may process personal data when they use our services, or how we may process personal data on their behalf in accordance with their instructions where we are acting as their processor. As a result, we recommend referring to the privacy notice of the customer with which you have a relationship for information on how they engage processors, like us, to process personal data on their behalf. In addition, we are generally not permitted to respond to individual requests relating to personal data we process on behalf of our customers, so we recommend directing any requests to the relevant customer.

Our Collection and Use of Personal Data

The categories of personal data we collect depend on how you interact with us and our services. For example, you may provide us your personal data directly when you apply for, obtain, or use our products and services, including in connection with loan origination or servicing, sign up for our mailing list, otherwise contact us, or interact with us.

We also collect personal data automatically when you interact with our websites and other services and may also collect personal data from other sources and third parties.

Personal Data Provided by Individuals

We collect the following categories of personal data individuals provide us:

- **Contact Information,** including first and last name, phone number, email address, mailing address, and communication preferences. We use this information primarily to fulfill your request or transaction, to communicate with you directly, and to send you marketing communications in accordance with your preferences.

- **Professional Information**, including job title, company name, professional and educational background, compensation, current and past job history, verification of current and past employment, and the nature of your relationship with us. We use this information primarily to fulfill your request or transaction, to determine how we communicate with you, to administer your account, to provide you with our services, and for customer support purposes.

- **Account Information**, including first and last name, email address, phone number, account credentials or one-time passcodes, and the products or services you are interested in, purchased, or have otherwise used. We use this information primarily to administer your account, provide you with our products and services, communicate with you regarding your account and your use of our products and services, and for customer support purposes.

- **Loan and Financial Information**, including information you provide in connection with a loan application or loan origination, servicing, or other account activity, such as your Social Security number, driver's license or other identification information, income, assets, liabilities, credit-related information, bank account information, property or collateral information, and other financial information. We use this information primarily to evaluate and process applications, originate and service loans, manage accounts, process payments, assess credit or fraud risk, and comply with legal and regulatory requirements.

- **Demographic and Eligibility Information**, including age, race, ethnicity, sex, veteran or servicemember status, and other information about protected characteristics that you voluntarily provide or that we collect in connection with your loan application or as otherwise permitted by law. We use this information primarily to comply with legal and regulatory requirements, including the Home Mortgage Disclosure Act, determine your legal ability to enter into a contract, and determine eligibility for certain benefits or protections.

- **Biometric Information**, including biometric identifiers or information, such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke or gait patterns, or other activity patterns used to extract a template or other identifier, where you provide or permit us to collect it. We use this information primarily to verify your identity, prevent fraud, protect the security of our products and services, and comply with applicable law.

- **Education Information**, including grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

- **Customer Content**, including any files, documents, audio, videos, images, data, or communications you choose to input, upload, or transmit to our products and services. We use this content primarily to provide you with our products and services, to facilitate your requests, and to improve our products and services.

- **Payment Information**, including payment card information, billing address, and other financial information (such as, routing and account numbers). Please note that we use third-party payment providers to process payments made to us. We do not retain any personally identifiable financial information, such as payment card number, you provide these third-party payment providers in connection with payments. Rather, all such information is provided directly by you to our third-party payment providers. The payment provider's use of your personal data is governed by their privacy notice.

- **Event and Survey Information**, including information provided when you sign up for an event, complete a survey or submit a testimonial. We use this information primarily to administer and facilitate our products and services, respond to your submission, communicate with you, conduct market research, inform our marketing and advertising activities, improve and grow our business, and facilitate the related event, content, promotion, or survey.

- **Security-Related Information**, including name and contact information of visitors to our premises, video recordings of visitors on our premises, and electronic login records and access details when a visitor utilizes company technology on our premises. We use this information primarily to protect the security of our premises, employees, and our company.

- **Feedback and Support Information**, including the contents of custom messages sent through the forms, chat platforms, email addresses, or other contact information we make available to customers, as well as recordings of calls with us, where permitted by law (including through the use of automated tools provided by us or our third-party providers). We use this information primarily to investigate and respond to your inquiries, to communicate with you via online chat, email, phone, text message or social media, and to improve our products and services.

If you choose to contact us, we may need additional information to fulfill the request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the request we receive or personal data we require fall outside the scope of this Privacy Notice. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.

Personal Data Automatically Collected

We, and our third-party partners, may automatically collect information about how you access and use our products and services when you engage with us. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Strictly necessary cookies and similar technologies may operate automatically when required for core website functionality, security, fraud prevention, or compliance. We will not activate non-essential cookies or other tracking technologies unless and until you affirmatively consent to their use through our cookie preference manager or another consent mechanism. Information we collect automatically about you may be combined with other personal information we collect directly from you or receive from other sources.

Using strictly necessary technologies that operate automatically and, only after affirmative consent, non-essential technologies, we and our third-party partners, may collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier or advertising ID). We may use technologies designed to recognize when two or more devices are likely being used by the same individual and may leverage these technologies to link information collected from different devices only after you affirmatively consent to their use and where permitted by law.

- **Information About the Way Individuals Use Our Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our services, how frequently you access our services, whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, and the content, links and ads you interact with). We employ third-party technologies designed to allow us to collect detailed information about

browsing behavior and actions that you take on our services, which may record your mouse movements, scrolling, clicks, and keystroke activity on our services and other browsing, search or purchasing behavior. These third-party technologies may also record information you enter when you interact with our products or services, or engage in chat features or other communication platforms we provide.

- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address, as well as more precise geolocation when you grant us access through your device settings.

Information collected through strictly necessary technologies, and through non-essential technologies only after you affirmatively consent, may allow us to improve your customer experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our products and services, to offer communications features, and to improve the effectiveness of our products, services, offers, advertising, communications, and customer service. We may also use this information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our products and services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the Your Privacy Choices section below.

Personal Data from Other Sources and Third Parties

We may receive the same categories of personal data as described above from the following sources and other parties:

- **Our Affiliates**: We are able to offer you the products and services we make available because of the hard work of our team members across all Symmetry entities. To provide our products and facilitate our services, including loan origination and servicing, Symmetry entities receive personal data from other Symmetry entities for purposes and uses that are consistent with this Privacy Notice.

- **Employers:** If you interact with our services in connection with your employment, we may obtain personal data about you from your employer or another company for which you work. For example, we may obtain your contact information from your employer to allow us to communicate with you about your employer's customer relationship with us.

- **Other Customers**: We may receive your personal data from our other customers. For example, a customer may provide us with your contact information as a part of a referral.

- **Social Media**: When you interact with our services through social media networks, such as when you follow us or share our content on social networks, we may receive some information that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and may include profile information, profile picture, username, and any other information you permit the social network to share with third parties. You should always review and, if necessary, adjust your privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information primarily to operate, maintain, and provide to you the features and functionality of our products and services, as well as to communicate directly with you, such as to send you messages about features that may be of interest to you.

- **Advertisers and Publishers**: We engage in advertising through third-party services. Advertisers and publishers may share personal data with us in connection with our advertising efforts. For example, we may obtain information about whether an advertisement on a third-party service led to a successful engagement between you and a third-party advertiser.

- **Business Partners**: We may receive your information from our business partners, such as companies that offer their products and/or services as a part of or in connection with our services. For example, certain of our products and services allow our customers to integrate third-party services. If you choose to leverage these third-party service integrations, we may receive confirmation from our business partner regarding whether you are an existing customer of their services.

- **Service Providers**: Our service providers that perform services on our behalf, such as analytics and certain marketing providers, collect personal data and often share some or all of this information with us. For example, we receive personal data you may submit in response to requests for feedback to our survey providers.

- **Other Sources**: We may also collect personal data about you from other sources, including publicly available sources, third-party data providers, brand partnerships, or through transactions such as mergers and acquisitions.

Additional Uses of Personal Data

In addition to the primary purposes for using personal data described above, we may also use personal data we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to facilitate payment for our products and services, or to deliver the services requested;

- Manage our organization and its day-to-day operations;

- Communicate with you, including via email, text message, chat, social media and/or telephone calls;

- Facilitate the relationship we have with you and, where applicable, the company you represent;

- Request you provide us feedback about our product and service offerings;

- Address inquiries or complaints made by or about an individual in connection with our products or services;

- Create and maintain accounts for our users;

- Identify financial discrepancies and repair errors;

- Verify your identity and entitlement to our products and services, including information submitted in connection with loan applications and servicing;

- Register you for and provide you access to events and surveys;

- Market our products and services to you, including through email, phone, text message, push notification, and social media;

- Administer, improve, and personalize our products and services, including by recognizing you and remembering your information when you return to our products and services;

- Develop, operate, improve, maintain, protect, and provide the features and functionality of our products and services;

- Identify and analyze how you use our products and services, using non-essential tracking data only where you have affirmatively consented;

- Create aggregated or de-identified information that cannot reasonably be used to identify you, which information we may use for purposes outside the scope of this Privacy Notice;

- Conduct research and analytics on our user base and our products and services, including to better understand the demographics of our users;

- Improve and customize our products and services to address the needs and interests of our user base and other individuals we interact with;

- Test, enhance, update, and monitor the products and services, conduct internal research for technological development, facilitate best practices and industry standards, or diagnose or fix technology problems;

- Help maintain and enhance the safety, security, and integrity of our property, products, services, technology, assets, and business;

- Defend, protect, or enforce our rights or applicable contracts and agreements (including our Terms and Conditions (Terms of Service), as well as to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;

- Detect, prevent, investigate, or provide notice of security incidents or other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Symmetry and others;

- Facilitate business transactions and reorganizations impacting the structure of our business;

- Comply with contractual and legal obligations and requirements;

- Use information voluntarily provided in connection with a loan application, including race, ethnicity, and sex for purposes of compliance with the Home Mortgage Disclosure Act, age to determine your legal ability to enter into a contract, and veteran or servicemember status to determine eligibility for certain benefits or protections;

- Fulfill any other purpose for which you provide your personal data, or for which you have otherwise consented.

Our Disclosure of Personal Data

We disclose or otherwise make available personal data in the following ways:

- **To Our Affiliates**: We are able to offer you the products and services we make available because of the hard work of our team members across Symmetry entities. To provide our products and facilitate our services, Symmetry entities disclose personal data to other Symmetry entities for purposes and uses that are consistent with this Privacy Notice.

- **To Your Employer**: If you interact with our services in connection with your employment, we may disclose personal data to your employer or another company for which you work. For example, we

may provide information to your employer about your usage of our services in connection with your work for them.

- **To Marketing Providers:** We coordinate and share personal data with our marketing providers in order to advertise and communicate with you about the products and services we make available.

- **To Business Partners, Loan Owners, and Investors**: We may share personal data with our business partners, including those used throughout loan origination and loan servicing, and with loan owners and investors. We may also allow our business partners to collect personal data directly from you in connection with our services. Our business partners may use your personal data for their own business and commercial purposes, including to send you information about their products and services, subject to applicable law and your privacy choices.

- **To Service Providers:** We engage other third parties to perform certain services on our behalf in connection with the uses of personal data described in the sections above, including information technology, cloud storage, account servicing, analytics, and payment processing. Depending on the applicable services, these service providers may process personal data on our behalf or have access to personal data while performing services on our behalf.

- **To Governmental Agencies:** We may disclose personal data to governmental agencies as part of the loan process or to comply with governmental requirements, supervision, licensing requirements, examinations, or similar regulatory matters.

- **In Connection with a Business Transaction or Reorganization:** We may take part in or be involved with a business transaction or reorganization, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose, transfer, or assign personal data to a third party during negotiation of, in connection with, or as an asset in such a business transaction or reorganization. Also, in the unlikely event of our bankruptcy, receivership, or insolvency, your personal data may be disclosed, transferred, or assigned to third parties in connection with the proceedings or disposition of our assets.

- **To Facilitate Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:

    - in connection with the establishment, exercise, or defense of legal claims;

    - to comply with laws or to respond to lawful requests and legal process;

    - to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;

    - to detect, suppress, or prevent fraud;

    - to reduce credit risk and collect debts owed to us;

    - to protect the health and safety of us, our customers, or any person; or

    - as otherwise required by applicable law.

- **With Your Consent or Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. For example, with your permission, we may post your testimonial on our websites.

Your Privacy Choices

The following privacy choices are made available to all individuals with whom we interact. You may also have additional choices regarding your personal data depending on your location or residency. Please refer to our Region-Specific Disclosures below for information about additional privacy choices that may be available to you.

Communication Preferences

- **Email Communication Preferences**: You can stop receiving promotional email communications from us by clicking on the "unsubscribe" link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).

- **Phone Communication Preferences**: You can stop receiving promotional phone communications from us by informing the caller you no longer wish to receive promotional phone calls from us, following the instructions provided on the call for opting out of promotional phone calls (where available), or replying STOP to any one of our promotional text messages. Please note we may need to continue to communicate with you via phone for certain service-related messages (such as, sending a verification code to your phone via call or text for purposes of verifying the authenticity of a log-in attempt).

- **Direct Mailing Preferences**: You can stop receiving promotional direct mail communications from us by contacting us at consumerprivacy@symmetrylending.com. Please note this opt-out does not affect any mailings that are controlled by third parties that may feature or mention our services.

Automatic Data Collection Preferences

Certain of our services may provide you the ability to adjust your preferences regarding our use of automatic data collection technologies. Only strictly necessary cookies and similar technologies may operate automatically; we will not activate non-essential cookies or other tracking technologies unless and until you affirmatively consent to their use.

Where a Symmetry-specific preference manager or privacy setting is not available, you may be able to utilize third-party tools and features to further restrict our use of automatic data collection technologies. These tools and features do not replace our affirmative consent process: we will not activate non-essential cookies or other tracking technologies unless and until you affirmatively consent to their use. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking strictly necessary cookies or similar technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

Partner-Specific Preferences

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Device-Specific / Platform-Specific Preferences**: The device and/or platform you use to interact with us (such as your mobile device or social media provider), may provide you additional choices regarding the data you choose to share with us. For example, many mobile devices allow you to change your device permissions to prevent our products and services from accessing certain types of information from your device (such as your contact lists), and many social media platforms allow you to change your platform permissions to prevent integrated products and services from accessing certain types of information connected with your profile. Please refer to your device or platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs. We will not activate non-essential tracking technologies for targeted advertising unless and until you affirmatively consent to their use.

- **Google Analytics**: Google Analytics allows us to better understand how our customers interact with our services only after you affirmatively consent to the use of its non-essential analytics technologies. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website here: www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Add-On here: https://tools.google.com/dlpage/gaoptout/.

Children's Personal Data

Our services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 13. If an individual is under the age of 13, they should not use our services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 13 has provided personal data to us, we encourage the child's parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 13, we will promptly delete that personal data.

Retention of Personal Data

We will usually retain the personal data we collect about you for no longer than reasonably necessary to fulfill the purposes for which it was collected, and in accordance with our legitimate business interests and applicable law. However, if necessary, we may retain personal data for longer periods of time as required under applicable law or as needed to resolve disputes or protect our legal rights.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Once retention of the personal data is no longer reasonably necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if that is not possible (for example, because personal data has been stored in backup archives), we will securely store the personal data and isolate it from further active processing until deletion or deidentification is possible.

Third-Party Websites and Services

Our services may include links to third-party websites, plug-ins, applications and other services. Except where we post, link to or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to any personal data practices of third parties. To learn about the personal data practices of third parties, please visit their respective privacy notices.

California's Shine the Light Law

California's "Shine the Light" law (Civil Code Section §1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal information to third parties for their direct marketing purposes. It is company policy that we do not disclose personal information to third parties for their direct marketing purposes if a consumer has exercised their right to opt out. To opt out of having your personal information disclosed to third parties for their direct marketing purposes, please contact us by following the instructions under the Contact Us section of this Privacy Notice.

Region-Specific Disclosures

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal data about residents of certain countries, regions or states. If you are a resident of the state of California in the United States, please click here for additional privacy disclosures that may be applicable to you, including a description of the personal data rights made available to residents of California.

Updates to This Privacy Notice

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify individuals by email to their registered email address, by prominent posting on this website or our other platforms, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

Contact Us

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to consumerprivacy@symmetrylending.com.