



Sunlight Financial[®]

SUNLIGHT FINANCIAL PRIVACY POLICY

INTRODUCTION

Sunlight Financial LLC (“Sunlight”, “Company”, “we”, “our”, or “us”) respects your privacy. This Privacy Policy describes the type of information we collect from you when you visit the Sunlight website or use the Sunlight portal Orange[®] or the mobile application of Orange[®] (collectively, the “Services”), as either the consumer applicant for solar or home improvement financing, as a contractor working with Sunlight to provide solar or home improvement financing (“contractor” or “you”), or as an investor, potential investor or other Services user (“you” or “Services user”).

This policy applies to information we collect from individuals acting or working in a commercial context. Sunlight primarily offers personal, household or family financial product or services. If you are a consumer or customer of personal, household, or family financial product or service, a separate financial privacy notice will apply. Please refer to our financial privacy notice for consumers of personal, household or family financial product or services by clicking [here](#).

This Privacy Policy is designed to inform you of the types of information we collect, how we use that information, the circumstances under which we will share it with others, and your ability to limit any sharing of your data for cross context behavioral advertising.

WHAT WE COLLECT

Sunlight collects information about you that we reasonably believe will be necessary or useful in processing or administering the products and Services you have requested. We collect the following types of information:

- information automatically collected when you visit or interact with the Services, through technology such as cookies, clear GIFs, pixel tags, log files, and other technologies including analytics and tracking tools from third-party service providers, which information often includes computer or device information, IP address, and usage information
- contractor legal entity name and information, including individual personnel contact information
- information about transactions originated through an individual contractor
- information we receive from third parties, such as from commercial credit reporting agencies, regarding contractor creditworthiness and credit history
- other information you may provide or which we collect about your business when you register as a contractor with us
- information that you provide to us, which may include when you use our Services, register or create an online account with us, request information from us, sign up for newsletters or our e-mail list, enter into sweepstakes or other promotions, fill out a survey, request customer support,

or otherwise communicate or contact us, such as your name, address, e-mail address, telephone number, referrals, and information about your solar activities, such as home ownership, home statistics, home energy usage or utility provider, or demographic information

HOW WE USE YOUR INFORMATION

We use your information for the following purposes:

- when it is required to complete your transaction
- you authorize us to do so
- as permitted or required by law
- for third parties to market their products and services to you if you consent to such sharing
- to conduct business with you such as through our referral partner program and for internal business analysis or other business purposes
- to personalize your experience with the Services, target our communications regarding products, services, or other offers, for our own internal marketing, and for internal business analysis or other business purposes

WHO WE SHARE YOUR INFORMATION WITH

We share your information with:

- our service providers
- with third parties who we or you conduct business with such as referral partners and for internal business analysis or other business purposes
- with third parties or law enforcement under legal process or as required under law

REVOCACTION OF CONSENT. If you would like to revoke your consent for Sunlight and its business partners to call you to offer you products and services to serve your financial needs, please call us toll-free at (888) 850-3359 or send a written request to Sunlight Financial LLC, 101 N. Tryon Street, Suite 1000, Charlotte, North Carolina 28246.

MAINTENANCE OF ACCURATE INFORMATION. We have established procedures designed to ensure that your information is as accurate and complete as possible. If you believe that our records contain inaccurate or incomplete information about you, please notify us by calling toll-free at (888) 850-3359 or by sending a written inquiry to Sunlight Financial LLC, 101 N. Tryon Street, Suite 1000, Charlotte, North Carolina 28246.

CONFIDENTIALITY AND SECURITY. We educate our teammates about the importance of confidentiality and privacy of consumer information. We maintain physical, electronic, and procedural safeguards that comply with federal standards to protect your information from unauthorized access.

Notice at Collection and Privacy Policy for California Residents

Effective Date: January 1, 2023

Last Revised/Reviewed on: January 1, 2023

This California Notice at Collection and Privacy Policy (“CCPA Disclosure”) explains how Sunlight collects, uses, discloses, sells, shares, and/or retains personal information (“Information Practices”) subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”). This CCPA Disclosure applies solely to California residents (“consumers” or “you”).

The CCPA does not apply to certain information we collect, including information subject to the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, and certain other state or federal privacy laws. This CCPA Disclosure does not apply to information that we collect about individuals who seek, apply for, or obtain our financial products and services for personal, family, or household purposes. Please refer to our financial privacy notice for if you are a consumer of a personal, household or family financial product or services by clicking [here](#).

This CCPA Disclosure does not apply to information we collect in the context of an individual’s interaction with us as a job applicant, employee, contractor, or other role within Sunlight Financial. Please refer to our [CCPA Workforce Disclosure](#).

NOTICE AT COLLECTION

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used, including whether that information is sold or shared. Please note that unless we interact with you in a business-to-business context most of the information we use is in the context of providing financial products and services and is therefore not subject to the CCPA.

General Personal Information

Categories of Personal Information	Purposes for Collection and Use	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
Identifiers: For example, a name, address, Internet Protocol address, email address, account name, date of birth, driver’s license or state identification card number, passport number, applicable issue and expiration date of government documents, issuing agencies of government	<ul style="list-style-type: none">• To fulfill or meet the reason for which the information is provided• To verify your identity• To improve our products and services	We sell/share IP address, device type and characteristics, unique device identifiers such as MAC Address, SSIDs, and AD ID), and log information to web analytics providers, and third-party cookie and tracking technology

documents, mother’s maiden name, and other similar identifiers.	<ul style="list-style-type: none"> • To protect against security risks 	providers to provide personalized ads.
<p>Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, 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.</p>	<ul style="list-style-type: none"> • For advertising and marketing • To conduct research, analytics, or other internal analysis • To conduct business with you or your employer in your role with a third party that we do business with • To operate, manage, and maintain our business 	No.
<p>Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin, age (40 and over), gender, sexual orientation, marital status, medical condition, ancestry, familial status, disability, veteran status, or genetic information.</p>	<ul style="list-style-type: none"> • To perform compliance activities or institutional risk control • To carry out our legal and business purposes, such as complying with federal, state, and local laws or responding to lawsuits or investigations, or to exercise our legal rights 	We sell/share this category of data to web analytics providers, and third-party cookie and tracking technology providers to provide personalized ads.
<p>Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> • At your direction or with your consent 	We sell/share this category of data to web analytics providers, and third-party cookie and tracking technology providers to provide personalized ads.
<p>Geolocation Data: For example, information that can be used to determine a device’s physical location.</p>		We sell/share this category of data to web analytics providers, and third-party cookie and tracking technology providers to provide personalized ads.

Sensory or Surveillance Data: For example, call recordings or other audio, electronic, or visual monitoring or surveillance.		No.
Professional or Employment-Related Information: For example, current and past compensation, evaluations, performance reviews, and employment history.		No.

We do not collect: commercial information, biometric information, education information, biometric information, or profile data.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information. We have not and do not sell any of your sensitive personal information or share with third parties for cross-context behavioral advertising.

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection and Use
<input checked="" type="checkbox"/>	Social Security Number, Driver’s License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> • To perform services you request and reasonably expect from us • To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible • To detect, prevent, and investigate security incidents involving your information • To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, and storage • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided

☒	Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • To enhance your experience on our website in real time, so long as we do not disclose your information to a third party • To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, providing analytics services, storage, and to fulfill orders • To ensure the quality or safety of a product, service, or device • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided
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We do not collect: precise geolocation, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, racial or ethnic origin, biometric information for the purpose of unique identification, health information, or information concerning sex life or sexual orientation.

Retention Periods

We retain information for different periods of time depending on the purposes for which we collect and use it. We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above, unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing your information.

Notice of Sale and/or Share

Our use of tracking technologies may be considered a sale or sharing with third parties for cross-context behavioral advertising (e.g., targeted advertising) under California law. You can opt-out of being tracked by these third parties by clicking the “Do Not Sell or Share My Personal Data” link at the bottom of our [website](#) and selecting your preferences.

Please review our California Privacy Policy below.

PRIVACY POLICY

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our collection, use, disclosure, selling, sharing, and/or retention personal information (“Information Practices”). You have certain rights to control the use of your personal information. This privacy policy describes your rights as it relates to our Information Practices and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about consumers, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

General Personal Information

The following categories have been collected and disclosed in the preceding 12 months	Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
Identifiers	<ul style="list-style-type: none"> • For our operational purposes or the operational purposes of our service provider or contractors • Keeping track of visitors to our website and monitoring the effectiveness of our advertising, including auditing relating to counting ad impressions of unique visitors, verifying positioning and quality, and auditing compliance. • Ensuring security and integrity as needed and as reasonably necessary and 	<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Online advertising services and networks • Web analytics providers • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers

<p>Personal Information Categories from Cal. Civ. Code § 1798.80(e)</p>	<p>proportionate for this purpose</p> <ul style="list-style-type: none"> • Debugging to identify and repair errors that impair existing functionality • Short-term, transient use • Performing services on behalf of the business, including maintaining or servicing accounts, providing products or services, providing customer service, processing orders or transactions, verifying customer information, providing financing, providing analytic services, storage, or other similar services. 	<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers
<p>Characteristics of CA or Federal Protected Classifications</p>	<ul style="list-style-type: none"> • Providing advertising and marketing services. • Undertaking internal research for technological development. • Undertaking activities to verify or maintain quality or safety of a service or device and to improve or enhance a service or device. 	<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Online advertising services and networks • Web analytics providers • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers

<p>Commercial Information</p>		<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Online advertising services and networks • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers
<p>Internet or Other Similar Network Activity</p>		<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers • Online advertising services and networks • Web analytics providers • Social networks • Operating system and platforms

<p>Geolocation Data</p>		<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • Online advertising services and networks • Web analytics providers
<p>Sensory or Surveillance Data</p>		<ul style="list-style-type: none"> • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Customer relationship management tool providers • Law enforcement, or other legal authorities • Government entities
<p>Professional or Employment-Related Information</p>		<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers

		<ul style="list-style-type: none"> • Customer relationship management tool providers
<p>Profile Data</p>		<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies • Data analytics providers • E-mail distribution service providers • Financial and accounting service providers • Customer relationship management tool providers • Online advertising services and networks • Web analytics providers • Social networks • Operating system and platforms

In the preceding 12-month period, we did not collect or disclose: biometric information or education information.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

<p align="center">The following categories have been collected and disclosed in the preceding 12 months</p>	<p align="center">Business or Commercial Purpose for Collection & Disclosure</p>	<p align="center">Categories of third parties to whom the information was disclosed</p>
<p>Social Security Number, Driver’s License, State Identification Card, or Passport Number</p>	<ul style="list-style-type: none"> • To perform services you request and reasonably expect from us • To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible • To detect, prevent, and investigate security incidents involving your information • To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, and storage • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided 	<ul style="list-style-type: none"> • Law enforcement, or other legal authorities • Government entities • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies

<p>Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account</p>	<ul style="list-style-type: none"> • To enhance your experience on our website in real time, so long as we do not disclose your information to a third party • To perform services for our business needs such as maintaining accounts, providing customer service, providing financing, verifying customer information, providing analytics services, storage, and to fulfill orders • To ensure the quality or safety of a product, service, or device • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided 	<ul style="list-style-type: none"> • Service Providers who assist us in offering a product or service to you • Service providers who assist our business in operations, such as cloud storage providers, web hosting providers, cybersecurity providers, operating and management companies
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We do not collect: precise geolocation, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, biometric information for the purpose of unique identification, health information, or information concerning sex life or sexual orientation.

For each category of personal information identified above, we also disclose such personal information to the following categories of third parties:

- **At Your Direction.** We may disclose your personal information to any third party with your consent or at your direction.
- **Business Transfers or Assignments.** We may disclose your personal information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

- **Legal and Regulatory.** We may disclose your personal information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

The categories identified as collected in the tables above were collected from the following categories of sources:

- You directly
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers
- Marketing partners

What We Sell to Third Parties or Share with Third Parties for Cross-Context Behavioral Advertising and Right to Opt-Out

We have sold or shared with third parties for cross-context behavioral advertising personal information to third parties in the preceding 12 months. The categories of personal information we may have shared with web analytics providers and third-party cookie and tracking technology providers to provide personalized ads include: Identifiers, Characteristics of CA or Federal Protected Classifications, Internet or Other Similar Network Activity, and Geolocation Data. We do not sell or share your sensitive personal information.

The purpose of the notice of Right to Opt-Out is to inform you that you have the right to direct us to stop selling or sharing your personal information, which is called the “Right to Opt-Out.”

You may exercise your Right to Opt-Out by:

- (1) Clicking “Do Not Sell or Share My Personal Data” at the bottom of our [website](#) to use the interactive form,
- (2) Submitting your request through an opt-preference signal (described further in the section titled “Opt-Out Preference Signals”)

Once you make an opt-out request, we will comply within 15 business days.

We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

Your Right to Know

You have the right to request that we disclose any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the business or commercial purpose for collecting, selling, or sharing with third parties for cross context behavioral advertising (e.g., targeted advertising)
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

Your Right to Request Correction of Inaccurate Personal Information

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements. We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

How To Exercise Your Rights – Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information, to correct information, or for deletion.

You may submit a request to know information, to correct information, or for deletion by providing your name, legal name of company you are associated with, last four digits of the EIN, and executive designated to sign legal documents on behalf of company, along with description of the type of request you are seeking, by emailing us at info@sunlightfinancial.com or by calling us toll free at (888) 850-3359. Your request will be verified by matching the information you provide to information that we have collected. For the right to know specific information, we will also require that you provide a signed declaration under penalty of perjury, which we will provide in our acknowledgment to your initial request.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

Using an Authorized Agent to Submit a Request

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a verifiable consumer request related to your personal information. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

If you're an authorized agent making a request, you must email us at info@sunlightfinancial.com and:

1. Provide the power of attorney given to you by the consumer pursuant to Probate Code sections 4000 to 4465; or

2. Provide proof of signed permission along with a copy of your ID **and** have the consumer e-mail us at info@sunlightfinancial.com to directly confirm with us that they provided you permission to submit the request.

Opt-Out Preference Signals

Our use of tracking technologies may be considered a sale/sharing under California law. You can opt-out of being tracked by these third parties by clicking the "Do Not Sell or Share My Personal Info" link at the bottom of our website and selecting your preferences, or by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). Your request to opt-out of sale/sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us. Because the signal is browser-specific, you will need to broadcast subsequent signals if you are accessing our website through different online devices (e.g., computers, smartphones, tablets).

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, 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 Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our [Website](#) following the posting of changes constitutes your acceptance of such changes.

Contact for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (888) 850-3359

Website: <https://sunlightfinancial.com/contact/>

Email: info@sunlightfinancial.com

Postal Address: Sunlight Financial LLC, 101 N. Tryon Street, Suite 1000, Charlotte, North Carolina 28246.

Attn: Legal Department