

Applicant Privacy Policy

Last Updated: October 9, 2025

Churchill Mortgage Corporation (Churchill) takes your privacy seriously. We want you to know how we collect, use, and disclose your personal information in connection with your application for employment with us. If you reside in California, **Privacy Rights for Applicants who are California residents** which supplements other information found in this Privacy Notice.

This Applicant Privacy Notice does not create or form part of any employment contract or otherwise.

This Privacy Notice explains:

- The categories of personal information we collect about Applicants
- The categories of sources from which we collect Applicant personal information
- The purposes for which we use Applicant personal information
- How we may disclose Applicant personal information
- How long we keep Applicant personal information
- Privacy rights for Applicants who are California residents
- Changes to this Privacy Notice
- How to contact us

Scope:

This Privacy Notice applies to the personal information of individuals in their capacity as job applicants to Churchill (Applicants). If you access or use the “Careers” page on our website or submit your personal information through any third-party job search, recruiting, or career networking websites or online services where our job openings may be posted, this Applicant Privacy Notice is intended to supplement any privacy notice or disclosures posted on any such websites or online services. This Applicant Privacy Notice does not address, and Churchill is not responsible for, the practices of any third parties, which have their own rules for how they collect and use your personal information. We encourage you to read the privacy notices of any websites and online services you engage with to understand how your personal information collected through such websites or online service may be processed.

Personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant.

The categories of personal information we collect about Applicants:

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, signature, social security number, government-issued identification information (e.g., driver's license, passport), photographs, social media handles, or other similar identifiers. Please note that generally social security numbers & government-issued identification information (e.g., driver's license, passport) are only collected following an employment offer being accepted unless otherwise required.
- **Professional or Employment-Related Information**, for example:
 - Biographical information, such as name, gender, date of birth, professional history, references, language proficiencies, professional qualifications, NMLS number, references, and information you make publicly available through job search or career networking sites.
 - Job applicant materials, such as your job application, resume or CV, cover letter, writing samples, portfolios, references, work history, education transcripts, whether you are subject to prior employer obligations, loan volume & loan production data, and information that referrers provide about you, and information necessary to complete background & credit checks and other screens permitted by law.
 - Job preferences, such as desired position and compensation, location preferences, and willingness to relocate. Information from the application process, such as any phone-screens, interviews, evaluations and outcomes of recruiting exercises.
- **Commercial Information**, for example: travel expense records for an interview.
- **Sensory or Surveillance Data**, for example: voice-mails, recordings or transcripts of phone or web-based interviews, and footage from video surveillance cameras if you access our offices.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations or professional or employment related organizations, for example, as stated on the Applicant's resume.
- **Characteristics of Protected Classifications Under State or Federal Law for Applicants**, for example: immigration status to verify employment eligibility, and information needed to evaluate accommodation requests regarding potential disabilities or other health conditions. Such information is collected on a purely

voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations.

The categories of sources from which we collect Applicants' personal information

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example, recruiters and pre-employment screening providers (where permitted by law), mortgage intelligence platforms, vendors and service providers that provide voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law.
- **Third parties**, for example, job references you authorize us to contact, professional employer organizations or staffing agencies.
- **Public internet sources**, for example, social media, job boards, public profiles, NMLS Consumer Access and other public online sources.
- **Public records**, for example, credentialing and licensing organizations.

Note: This Privacy Notice does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act. Churchill provides a separate disclosure for such screening.

The purposes for which we use Applicant personal information

Generally Applicable Purposes

Unless stated otherwise we may use Applicants' personal information for the following purposes:

Recruiting, including:

- To evaluate Applicants' qualifications or suitability for employment with Churchill
- To communicate with Applicants
- To conduct a pre-employment or criminal history background check (with required candidate authorization only)
- For identification purposes
- To accommodate disabilities or health conditions
- To create a talent pool for future job openings

- For recordkeeping purposes
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, e.g., acknowledgment of employment application, offer letter
- To evaluate and improve the recruiting process
- To create a database of past employees

Monitoring, Security, and Compliance, including:

- To conduct internal audits and investigations
- To monitor and protect the safety and security of Churchill's facilities, personnel, and guests
- To enforce internal policies and procedures
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise Churchill's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

Conducting Our Business, including:

- For training purposes or quality assurance with respect to Churchill employees conducting the interviews or otherwise assisting with the recruiting and hiring process

Miscellaneous Other Purposes:

- To manage litigation involving Churchill, and other legal disputes and inquiries and to meet legal and regulatory requirements
- To protect the rights, property, or safety of Churchill, HR Individuals, customers or others

Purposes For Using Applicants' Protected Categories of Information:

Churchill collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act.

Churchill also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and state law

related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

How we may disclose Applicant personal information

Churchill may have a legitimate business need to disclose Applicants' personal information for one of the purposes listed above, or as otherwise disclosed to you at the time of collection, to one or more of the categories of external recipients listed below.

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Service providers and contractors:** Churchill discloses your personal information to service providers and contractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations. Service providers and contractors may include recruiters, law firms, travel agencies, pre-employment screening, recruitment analytics, and any other entity providing services to Churchill.
- **Government or administrative agencies:** These may include, for example:
 - Equal Employment Opportunity Commission as required for reporting.
 - State equal employment agencies as required to respond to employment claims and charges.
 - Law enforcement in the event of criminal investigations.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Churchill, or others.
- **Business transfer participants:** Parties to transactions and potential transactions whereby we sell, transfer or otherwise share some or all of our business or assets, including your personal information, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

How long we keep Applicant personal information

If Churchill hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. Churchill will retain application information for the entire duration of your employment relationship with Churchill and for as long thereafter as permitted or required by applicable law.

Churchill will retain your personal information for as long as necessary to fulfill the purpose of collection, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish and defend legal claims, for fraud prevention purposes, or as long as required to meet our legal obligations. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information and the applicable legal requirements.

Privacy Rights for Applicants who are California residents

This section applies only to Applicants who are residents of the state of California.

California applicants may exercise the rights listed below. However, these rights are not absolute, and in certain cases we may not be able to respond to your request, such as when a legal exemption applies or if we are not able to verify your identity.

Know/Access: You can request the following information about how we have collected and used your personal information:

- the categories of personal information that we have collected.
- the categories of sources from which we collected personal information.
- the business or commercial purpose for collecting, selling, or sharing (if applicable) personal information.
- the categories of third parties with whom we disclose personal information.
- a copy of the personal information that we have collected about you.

Delete: You can ask us to delete the personal information that we have collected from you.

Correct: You can ask us to correct inaccurate personal information that we maintain about you.

Nondiscrimination: You are entitled to exercise the rights described above free from discrimination.

To the extent we collect sensitive personal information (as defined under California law), we only use or disclose it for purposes permitted under California law (e.g., to perform HR activities such as payroll and benefits, monitor for security incidents, and for compliance and safety purposes). We do not collect or use sensitive personal information for the purpose of inferring characteristics about California candidates.

Further, we do not and, during the 12 months preceding the “Last Updated” date of this Applicant Privacy Notice, have not “sold” or “shared” personal information about candidates. Further, we do not knowingly “sell” or “share” the personal information of California residents under 16 years of age.

To submit a privacy rights request, please do so based on the methods listed below in “How to Exercise Your Rights”.

We may need to confirm your identity to process your requests to know/access, delete, or correct. In addition, consistent with California law, you may designate an authorized agent to make a request on your behalf. If you do so, we may require proof of your identification, the authorized agent’s proof of identification, and any other information that we may request in order to verify the request, including evidence of valid permission for the authorized agent to act on your behalf. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

How to Exercise Your Rights

Churchill will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You, or an authorized agent, can exercise these rights in the following ways:

- Email careers@churchillmortgage.com
- Call us toll-free at 888-562-6200

How We Will Verify Your Request:

The processes that we follow to verify your identity when you make a request to know, correct, or delete is to verify the email address that you used when you applied for a role at Churchill.

If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will not use that information for any purpose other than verification.

If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

Authorized Agents

If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity.

Churchill's Non-Discrimination and Non-Retaliation Notice

Churchill will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the California Privacy Rights Act.

Changes to this Privacy Notice

We reserve the right to change this Privacy Notice at any time. If we change this Privacy Notice, we will post those changes on this page and update the Privacy Notice modification date above. Any changes will become effective when we post the revised Privacy Policy here or in the respective job posting.

How to contact us

For questions or concerns about Churchill's privacy policies and practices in connection with Applicants, please contact us at careers@churchillmortgage.com or 888-562-6200