

## **State Privacy Policy - Effective June 15, 2025**

This State Privacy Policy is a supplement to, and incorporates, First Orion's Privacy Policy for the US and Canada and applies to consumers who are residents of states with consumer privacy laws. This notice describes the additional rights provided by applicable consumer privacy laws of California, Colorado, Connecticut, Delaware, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Texas, Utah, Virginia, and other applicable privacy laws (collectively, the "State Privacy Laws"). As additional states enact additional rights on behalf of their residents, First Orion will comply with such laws to the extent applicable to any personal information we collect. This State Privacy Policy is not intended to be a complete list of all such state rights.

### **Additional Rights**

Verification. You have the right to submit a request to First Orion to exercise your right to know, your right to correct or delete, and in some cases your right to opt out as described below. Before fulfilling the request, First Orion must verify that you are the one about whom it has collected personal information. Failure to satisfactorily verify your identity will prevent the request from being fulfilled in its entirety.

Right to Know and Access. You have the right to request that we confirm whether First Orion is processing your personal information. You also have a right to access such personal information. Upon receipt of a verifiable request, First Orion will disclose to you the specific pieces of personal information it has collected. The types of sources from which the personal information is collected, the business purpose for which the personal information is collected, and the categories of third parties with whom First Orion shares the personal information can be found in the Privacy Policy for the US and Canada.

Right to Delete. You have the right to request that First Orion delete any of your personal information. If you submit a verifiable request to delete, First Orion will delete all of your personal information from its records unless that personal information is necessary for First Orion to complete the transaction for which the information was collected, to protect against deceptive, fraudulent, or illegal activity, to enable solely internal uses that are aligned with your relationship with First Orion or comply with a legal obligation.

Right to Correct. You have the right to request that First Orion correct any of your personal information. You may submit a verifiable request that we correct inaccurate personal information that we maintain about you.

Right to Opt Out. You have the right to opt out of the sale or sharing of your personal information. If you submit a verified request to opt out, First Orion will stop selling or sharing personal information about you to third parties. If, later, you want to allow First Orion to sell or share your personal information, you can send an opt in request to First Orion.

Right to Limit Use and Disclosure of Sensitive Personal Information. In some circumstances, you have the right to limit sensitive personal information. We do not collect any sensitive personal information.

Right to Appeal. You may dispute a decision made in response to a privacy-related request such as a denial of a request to access, correct, delete, or opt out of data processing.

Right of No Retaliation. You have the right not to receive discriminatory treatment for the exercise of your privacy rights, subject to certain limitations, including if you are an employee, applicant, or independent contractor of our business.

Submit Requests. To exercise your rights, you may send an email to [privacy@firstorion.com](mailto:privacy@firstorion.com). In addition, First Orion provides a prominent link on our website (“Do Not Sell My Personal Information”) to a webpage to submit a request.

### **Additional Information about a Consumer’s Rights under State Privacy Laws**

#### Personal Information

The rights listed above only apply to your personal information - meaning information that identifies, relates to, describes, or could reasonably be linked to you (such as your name, your phone number, online identifiers, records of services purchased, purchasing history, browsing or search history, and inferences drawn from any other personal information). Personal information does not include publicly available information that is made available from government records.

#### Service Providers

In those instances where First Orion is a service provider to another business and you send First Orion a request, the request can only be acted on by the business, not First Orion.

#### **Consumer requests handled by First Orion in the past year:**

<b>Year 2024</b>	<b>Total Requests to Exercise Consumer Rights</b>	<b>Right to Know (Access Categories and/or Elements of Personal Information)</b>	<b>Right to Delete Personal Information</b>	<b>Right to Opt Out of the Sale of Personal Information</b>
<b>Received</b>	28,464	121	0	28,343
<b>Fulfilled</b>	26,874	114	0	26,760
<b>Denied</b>	1,590	7	0	1,583

#### Privacy questions

You may opt out of the sale of your personal information from our Call Knowledge services at [privacy.firstorion.com](https://privacy.firstorion.com).

If you have questions or concerns about this Privacy Policy or our information practices, please contact us at 1-877-640-4220, [privacy@firstorion.com](mailto:privacy@firstorion.com), or <https://firstorion.com/contact-general/>.

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