

PRIVACY POLICY
Gramm-Leach-Bliley Act of 1999 (GLBA)

I. INTRODUCTION

It is Cascade’s policy and practice to establish and clearly communicate our information-sharing practices and to protect nonpublic customer information by fully complying with the requirements of the Gramm-Leach-Bliley Act of 1999 (GLBA) and Regulation P promulgated thereunder, as well as applicable state privacy laws.

This document was created to identify to internal and external audiences Cascade’s policies and procedures for complying with the specific requirements set forth in these laws and regulations.

II. OVERVIEW

The GLBA governs the treatment of an individual’s Nonpublic Personal Information (NPI) by financial institutions. The Act has been further strengthened and procedures have been further streamlined by subsequent amendments. The GLBA allows states to formulate protections that exceed federal law.

The GLBA has three major elements that are designed to protect the disclosure of NPI: The Financial Privacy Rule, The Safeguards Rule, and Pretexting Protection.

1. The Financial Privacy Rule governs 1) the collection, disclosure and redisclosure of NPI, including customer account numbers; 2) the content and distribution of privacy notices; and 3) the opt-out rights and responsibilities of both institutions and consumers/customers.
2. The Safeguards Rule was implemented by the Federal Trade Commission to identify the requirements an institution must meet in all areas of operation to ensure the security and confidentiality of NPI.
3. Pretexting Protections address unauthorized attempts to access NPI with standards an institution must meet in order to safeguard against pretexting (sometimes referred to as “social engineering.”)

Cascade respects the trust that customers place in us by sharing their information. As such, we have established a fully-compliant Privacy program that complies with the GLBA as well as related state laws that afford greater privacy protections.

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III. DEFINITIONS

1. Financial Institution

GLBA restricts financial institutions from selling, giving, or otherwise disclosing personal information to third parties without permission and requires that financial institutions protect personal information entrusted to them. GLBA defines “financial institutions” as all businesses, regardless of size, that are “significantly engaged” in providing financial products or services. Pursuant to this definition, Cascade is a “financial institution” covered by GLBA.

2. NPI

NPI consists of any data or information considered to be personal in nature and not subject to public availability. NPI can include, but is not limited to:

- Wage information
- Email addresses
- Unlisted phone numbers and cell phone numbers
- Employment information
- Asset information
- Social Security numbers
- Bank account information
- State identification card numbers
- Driver's license numbers
- The fact that someone is applying for a Cascade loan
- Account status
- Credit reports and other credit information

NPI does not include information that is lawfully made available to the general public from such sources as information in a telephone book or a publicly recorded document, such as a mortgage or securities filing. For example, while telephone numbers are typically listed in a public telephone directory, an individual can elect to have an unlisted number. In that case, the person’s phone number would not be “publicly available.”

3. Consumers and Customers

Cascade’s obligations under GLBA, depend, in part, on whether clients are “customers” or “consumers.”

GLBA defines a “consumer” as an individual (or that individual’s legal representative) who obtains or has obtained a financial product or service that is used primarily for personal, family, or household purposes from a financial institution. A relevant example to our business is applying for a loan (whether or not the individual actually obtains the loan).

The Act defines “customers” as a subset of consumers that maintains a *continuing* relationship with the financial institution. For example, a consumer is transformed into a customer once he or she obtains a loan from Cascade.

The GLBA has established a special rule for instances in which several financial institutions participate in a single loan transaction. Here is that rule as it pertains to our business.

- Cascade establishes a “customer” relationship with an individual when we originate a loan.
- If we sell the loan but maintain the servicing rights, Cascade continues to have a “customer” relationship with the individual.
- If Cascade transfers the servicing rights but retains an ownership interest in the loan, the individual becomes our "consumer" and a "customer" of the institution with the servicing rights.
- If other institutions hold an ownership interest in the loan (but not the servicing rights), the individual is their “consumer.”

IV. PROCEDURES RELATED TO FINANCIAL PRIVACY

A. Privacy Notice

Cascade uses as the basis for its Customer Privacy Notice the most current version of the Model Privacy Forms provided as an Appendix to Regulation P. Cascade amends the form in accordance with the instructions given in Appendix A to Regulation P.

Cascade’s current Privacy Notice is attached hereto as Exhibit A.

Cascade updates our Customer Privacy Notice as necessary to reflect any changes required by law. At a minimum, Cascade will review its Customer Privacy Notice on an annual basis to ensure that the Notice remains accurate.

B. Privacy Notice Distribution

1) Online

Cascade's Privacy Notice is published on our website at <https://www.cascadeloans.com/privacy-policy/>.

2) At Loan Origination

Regulation P requires the Consumer Privacy Notice to be provided to “[a]n individual who becomes your customer not later than when you establish a customer relationship” as defined in the “Definitions” section above. Cascade provides its Privacy Notice with the initial disclosure package it sends to all loan applicants.

3) Annual Distribution

In April of every year, Cascade will distribute its then-current Consumer Privacy Notice, as well as any applicable opt-in and opt-out forms, to all of its then-current customers, i.e., those customers with whom Cascade has a continuing relationship. Cascade will include in this annual distribution, all customers whose loans we service, even if the customer has filed for bankruptcy, and/or has provided “cease and desist” letters under the FDCPA.

4) Distribution upon Revision

In addition to the annual distribution of Cascade's Consumer Privacy Notice, we will immediately notify our customers of any updates or changes by distributing the revised Privacy Notice to customers before any updates or changes take effect.

V. NPI SAFEGUARDS**A. Internal Controls**

Cascade maintains physical, electronic and procedural safeguards that comply with federal regulations to guard NPI. This includes, but is not limited to:

1. Limiting access to personally identifiable information to those employees with a business reason for knowing the information. Employees who possess such confidential and/or proprietary information are trained to understand the importance of confidentiality and customer privacy. Specifically, employees are taught that:

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- a. Access has been given to them for an expressed, permissible business purpose, and may only be disclosed on a need-to-know basis and for that business purpose, and
 - b. private customer information must never be disseminated to unauthorized persons including other employees who do not have a need-to-know basis for receiving the information.
2. Requiring all documents containing NPI to be secured in locked cabinets or file drawers when not in use.
3. Using shredders and/or confidentiality bins for disposal of NPI when no longer needed.
4. Conducting periodic sweeps of work areas to ensure compliance with the Policy.

B. IT Controls

Cascade's IT Department is responsible for implementing security measures to protect customer NPI and other information, as documented in Cascade's IT Information Security Policy and Procedure.

VI. TRAINING

Cascade conducts both formal and informal GLBA training for employees involved in servicing or other areas affected by the GLBA obligations. Training may consist of a combination of classroom instruction, computer based instruction and/or memorandum.

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VII. APPENDIX
Privacy Notice

Rev. 02/17

FACTS	WHAT DOES SOUTHWEST STAGE FUNDING, LLC DBA CASCADe FINANCIAL SERVICES AND CASCADe LAND HOME FINANCING DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number and assets ▪ credit history and credit scores ▪ employment information and income When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.
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How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Southwest Stage Funding, LLC chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does Southwest Stage Funding, LLC share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call toll-free (877) 869-7082
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Page 2

Who we are

Who is providing this notice?	SOUTHWEST STAGE FUNDING, LLC DBA CASCADe FINANCIAL SERVICES AND CASCADe LAND HOME FINANCING
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What we do

How does Southwest Stage Funding, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Southwest Stage Funding, LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ apply for a loan or give us your income information ▪ provide account information or provide employment information ▪ show your government-issued ID <p>We also collect your personal information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes - information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Cascade Financial Holdings, LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Southwest Stage Funding, LLC does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>Southwest Stage Funding, LLC doesn't jointly market.</i>

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