

CALIFORNIA CONSUMER PRIVACY ACT POLICIES AND PROCEDURES

The following Policies are effective for the Cascade 365 Group of Companies, including Cascade Capital, LLC; Cascade Capital, LLC – Series A; Cascade Capital, LLC – Series B; Cascade Capital, LLC – Series C; Cascade Capital, LLC – Series D; Cascade Capital Funding, LLC. Unless otherwise stated the policy shall apply to all listed companies and divisions.

General:

The Cascade 365 Group of Companies will not use a consumer's personal information for any purpose other than those disclosed in the notice at collection. [§ 999.305(a)(3)]

The Cascade 365 Group of Companies will not collect categories of personal information other than those disclosed in the notice at collection. [§ 999.305(a)(4)]

The Cascade 365 Group of Companies will not sell the personal information of consumers. [§ 999.306(d)]

The Cascade 365 Group of Companies will not offer consumers a financial incentive or price or service difference in exchange for the retention or sale of their personal information. [§ 999.307]

Notices

Notice at Collection

The Cascade 365 Group of Companies will provide a Notice at Collection at or before the time any of them collects personal information from the consumer. The Notice at Collection will inform the consumer of the categories of personal information to be collected from them and the purposes for which the categories of personal information will be used. The Notice at Collection will be provided in initial telephone calls to California consumers and on any letter or webpage that collects personal information from consumers.

Privacy Policy

The Cascade 365 Group of Companies website shall have a conspicuous link to its Privacy Policy on its homepage that contains the word "privacy."

Readability and Accessibility

The Notice at Collection and the Privacy Policy, including the notices and consumer rights stated therein, will be designed and presented in a way that is easy to read and understandable to an average consumer. They will use plain, straightforward language and avoid technical or legal jargon and use a format that is readable, including on smaller screens, if applicable. They will be available in the languages its ordinary course provides other information to consumers. They will be accessible to consumers with disabilities and provide information on how a

consumer with a disability may access them in an alternative format. Additionally, the Privacy Policy will be available in an additional format that allows a consumer to print it out as a separate document.

Receiving Requests to Know and Requests to Delete

The Cascade 365 Group of Companies will provide three designated methods for submitting request to know and requests to delete, taking into consideration the methods by which it interacts with consumers. Those methods are:

1. A toll-free telephone number;
2. On online webform; and
3. An online form for printing and mailing. [§ 999.312(a)-(c)]

The online webform for submission of requests to delete will use a two-step process where the consumer must first, clearly submit the request to delete and then second, separately confirm that they want their personal information deleted. [§ 999.312(d)]

When a request to know or a request to delete is not submitted in one of the three designated manners, **The Cascade 365 Group of Companies** will [treat the request as if it had been submitted in accordance with the designated manner] [provide the consumer with specific directions on how to submit the request or remedy any deficiencies with the request, if applicable]. [§ 999.312(f)]

Verifying Requests to Know or Requests to Delete

The Cascade 365 Group of Companies will verify the identity of the person making the request by matching the identifying information provided by the consumer with personal information of the consumer already maintained by the **Cascade 365 Company** receiving the request.

- For a request to know the categories of personal information, the **Cascade 365 Company** receiving the request will match at least two data points provided by the consumer with data points maintained by the **Cascade 365 Company** receiving the request.
- For a request to know specific pieces of personal information, the **Cascade 365 Company** receiving the request will:
 - Match at least three pieces of personal information provided by the consumer with personal information maintained by the **Cascade 365 Company** receiving the request; and
 - Require a signed declaration under penalty of perjury that the requestor is the consumer whose personal information is the subject of the request. The **Cascade 365 Company** receiving the request shall maintain all signed declarations as part of their record-keeping obligations. [§999.325]

Whenever possible, the **Cascade 365 Group of Companies** receiving the request will avoid asking for:

1. The consumer's first name or first initial and his or her last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted or redacted:
 - a. Social security number.
 - b. Driver's license number or California identification card number.
 - c. Account number, credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account.
 - d. Medical information.
 - e. Health insurance information.
2. A username or email address in combination with a password or security question and answer that would permit access to an online account. [§§ 999.323; 999.325]

If there is no reasonable method by which the **Cascade 365 Company** receiving the request can verify the identity of the consumer using the methods described in this policy, the **Cascade 365 Company** receiving the request will deny the request and provide an explanation in its response to the request. [§ 999.325(f)]

A consumer may submit a request to know or a request to delete using an authorized agent. In that situation:

1. The consumer must provide the authorized agent written permission to make the request;
2. The authorized agent must provide the original written permission to the **Cascade 365 Company** receiving the request;
3. The consumer must verify their identity directly with the **Cascade 365 Company** receiving the request; and
4. The consumer must confirm they are giving consent to the **Cascade 365 Company** receiving the request to provide information to the authorized agent. This is necessary to prevent a violation of 15 U.S.C. § 1692c(b).

The **Cascade 365 Company** receiving the request will deny a request if any one of these elements is not fulfilled and provide the consumer with an explanation for the denial.

These authorized agent requirements do not apply if the consumer has provided the authorized agent with a power of attorney which the authorized agent has presented to the **Cascade 365 Company** receiving the request. [§ 999.326]

The **Cascade 365 Company** receiving the request will retain as business records all documents submitted with respect to requests made by authorized agents.

Responding to Verified Requests

In General

Upon receiving a request to know or a request to delete, the **Cascade 365 Company** receiving the request will confirm receipt of the request within 10 days and provide information about

how the **Cascade 365 Company** receiving the request will process the request. The information provided shall describe the **Cascade 365 Company** receiving the request verification process and when the consumer should expect a response, except in instances where [] has already granted or denied the request. [§ 999.313(a)]

The **Cascade 365 Company** receiving the request will respond to requests to know and requests to delete within 45 days or receipt of the request, regardless of the time required to verify the request. If more time is needed, up to a maximum of 90 days of receipt, the **Cascade 365 Company** receiving the request will provide the consumer with an explanation. [§ 999.313(b)]

Requests to Know

In response to a verified request to know specific pieces of information, the **Cascade 365 Company** receiving the request will not provide any specific pieces the disclosure of which would create a substantial, articulable, and unreasonable risk to the security of that personal information, the consumer's account with the **Cascade 365 Company** receiving the request, or the security of the **Cascade 365 Group of Companies** systems or networks. [§ 999.313(c)(3)]

In response to a verified request to know specific pieces of information, the **Cascade 365 Company** receiving the request will never provide a consumer's:

- Social Security number;
- driver's license number or other government-issued identification number;
- financial account number;
- health insurance or medical identification number;
- account password; or
- security questions and answers.

[§ 999.313(c)(4)]

In response to a verified request to know categories of personal information, categories of sources, and/or categories of third parties, the **Cascade 365 Company** receiving the request will provide an individualized response unless the response would be the same for all consumers and the privacy policy discloses all the information that would otherwise be required in a response to a request to know such categories. [§ 999.313(c)(9)]

In responding to a verified request to know categories of personal information, the **Cascade 365 Company** receiving the request will provide for each identified category of personal information it has collected about the consumer:

1. The categories of sources from which the personal information was collected;
2. The business or commercial purpose for which it collected the personal information;
3. The categories of third parties to whom the **Cascade 365 Company** receiving the request disclosed the category of personal information for a business purpose; and
4. The business or commercial purpose for which the **Cascade 365 Company** receiving the request sold or disclosed the category of personal information. [§ 999.313(c)(10)]

Requests to Delete

In response to a verified request to delete, the **Cascade 365 Company** receiving the request will either delete all or part of the personal information received from the consumer or deny all or part of the request. [§ 999.313]

The **Cascade 365 Company** receiving the request will delete personal information received from the consumer by:

- Permanently and completely erasing the personal information on its existing systems with the exception of archived or back-up systems;
- De-identifying the personal information; or
- Aggregating the personal information. [§ 999.313(d)(2)]

In its response, the **Cascade 365 Company** receiving the request will inform the consumer which method was used to delete the personal information and disclose to the consumer that it will maintain a record of the request pursuant to Cal Civ Code § 1798.105(d). [§ 999.313(d)(4)]

If the **Cascade 365 Company** receiving the request denies the consumer's request, it will:

1. Inform the consumer that it will not comply with the consumer's request and describe the basis for the denial, including any statutory and regulatory exception therefor;
2. Delete the consumer's personal information that is not subject to the exception; and
3. Not use the consumer's personal information retained for any other purpose than provided for by that exception. [§ 999.313(d)(6)]

Training

The Cascade 365 Group of Companies will provide training to all individuals responsible for handling consumer inquiries regarding []'s privacy practices or the business's compliance with the CCPA. The training will inform the individuals of all the requirements in the CCPA and regulations and how to direct consumers to exercise their rights under the CCPA and regulations. [§ 999.317(a)]

Recordkeeping

The Cascade 365 Group of Companies will maintain records of consumer requests made pursuant to the CCPA and how the [] responded to said requests for at least 24 months. The records must include:

- Date of request;
- Nature of request;
- Manner in which the request was made;
- Date of []'s response;
- Basis of denial, if applicable.

Information maintained for record-keeping purposes will not be used for any other purpose. [§ 999.317(b)-(f)]