# Advance America - California Disclosures and Privacy Policy ("California Privacy Policy")

The State of California requires that we provide privacy information for individuals who reside in California. If you do not reside in California, the provisions of this California Privacy Policy will not apply to you.

For California residents, here is a summary of what you will learn from this California Privacy Policy:

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# Below is the legal information we are required to share:

These California Disclosures and Privacy Policy supplement the information contained in our Privacy Notice of Advance America, Cash Advance Centers, Inc., and the website <a href="www.advanceamerica.net">www.advanceamerica.net</a>, and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this California Privacy Policy to comply with the California Consumer Privacy Act, the California Privacy Rights Act, and other California laws. The California Consumer Privacy Act and the California Privacy Rights Act are collectively referred to as "CCPA." Any terms defined in the CCPA have the same meaning when used in these California Disclosures and Privacy Policy.

# 1. PERSONAL INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual consumer, device, or household ("personal information").

#### 1.1. Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA, such as personal information covered by certain sectorspecific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994 (DPPA).

AS A COURTESY, THE FOLLOWING DISCLOSURES INCLUDE INFORMATION THAT IS EXEMPT FROM CCPA. THE COURTESY DISCLOSURES ARE MADE WITH A RESERVATION OF ALL RIGHTS THAT WE HAVE UNDER CCPA.

# 1.2. Categories of Personal Information We Collect:

In the last 12 months, we collected the following categories of personal information:

- "Sensitive Personal Information" such as Social Security numbers (SSNs), Driver's license, financial account or card numbers, Precise geolocation, Racial and ethnic characteristics, Religious and philosophical beliefs, Union membership, Contents of mail, email and text messages, Genetic and biometric data.
- "<u>Identifiers</u>" such as name, alias, address, unique identifier, internet protocol address, email address, account number, Social Security Number, or government identification number;
- "Other Personal Information" such as name, signature, Social Security Number, physical
  characteristics or description, address, telephone number, passport number, driver's license or
  state identification card number, vehicle identification number (VIN), insurance policy number,
  education, employment, employment history, bank account number, credit card number, debit
  card number, or any other financial information. Some personal information included in this
  category may overlap with other categories;
- "Protected Characteristics" under California or federal law for classifications such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, or veteran or military status;
- "Commercial Information" such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- "Internet or Network Activity" such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement;
- "Biometric Information" such as genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, or gait;
- "Sensory Data" such as audio, electronic, or visual information;
- "Professional or Employment Related Information" such as current or past job history or performance evaluations; and
- "Inferences" such as profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

#### 1.3. How We Obtain Your Personal Information:

Directly from you.	You enter or provide us with information online, by email, by phone, by completing forms in our stores, or by document upload.  For example, when you apply for a loan or financial services product, show us your government issued ID, or pay your bill.
Directly and indirectly from you based on activity on our website.	For example, from submissions through our website or website usage details collected automatically.
From vendors that interact with us in connection with the products and services we provide.	For example, companies that work with us to market our products to you, credit reporting agencies, or other vendors that provide data we use in underwriting or in protecting you and our products from fraud and identity theft.

#### 1.4. How We Use Your Personal Information:

We may collect, use, or disclose the personal information we collect for one or more of the following purposes:

- Performing services such as maintaining or servicing accounts, providing customer service, processing, or fulfilling transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of us or by our service providers. Examples of such activities:
  - o To fulfill or meet the reason for which the information is provided.
  - o To provide you with information, products, or services that you request from us.
  - To provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you.
  - To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- Undertaking internal research for technological development and demonstration.
- Debugging to identify and repair errors that impair existing intended functionality.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Short-term, transient use, provided the personal information that is not disclosed to another
  third party and is not used to build a profile about a consumer or otherwise alter an individual
  consumer's experience outside the current interaction, including, but not limited to, the
  contextual customization of ads shown as part of the same interaction.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or

enhance the service or device that is owned, manufactured, manufactured for, or controlled by

• To comply with our legal or regulatory obligations.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### 1.5. How Long We Retain Your Personal Information

- Absent legal requirements to the contrary, such as a legal hold, customer personal information is
  retained for a specified period of time, as required by legal, regulatory, or industry requirements, as
  well as for business purposes.
- For Personal Information that is subject to exemption under CCPA (GLBA, FCRA, CalFipa, DPPA) information is retained for a specified period of time, as required by law.
- We maintain the categories of personal information identified above in Section 1.2 for 36 months from our last interaction. This includes consumers who interact with our site, completed applications, abandoned applications, or requests for service.
- We maintain records of consumer requests made pursuant to the CCPA and how the business responded to such requests for at least 24 months.

#### 1.6. Who We Disclose Your Personal Information With:

We may disclose your personal information to a service provider, contractor, or third party. When we disclose personal information to a service provider or contractor, we enter a contract that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract or as otherwise allowed under the CCPA. We disclose to third parties as follows:

With our <u>account linking services</u> we disclose Sensitive Personal Information, Identifiers, Personal Information, Protected Characteristics, Commercial Information, and Internet or Network Activity.

With our <u>affiliates</u> we disclose Sensitive Personal Information, Identifiers, Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric, Sensory Data, Professional or Employment Related Information, and Inferences.

With our <u>credit reporting agencies</u>, we disclose Sensitive Personal Information, Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Professional or Employment Related Information, and Inferences.

With our <u>advisors</u> such as lawyers, banks, and insurers, we disclose Sensitive Personal Information, Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric, Sensory Data, Professional or Employment Related Information, and Inferences.

With our <u>governmental and regulatory agencies</u>, we disclose Sensitive Personal Information, Identifiers, Personal Information, Protected Characteristics, Commercial Information, Internet or

Network Activity, Biometric, Sensory Data, Professional or Employment Related Information, and Inferences.

With our <u>data analytics and web hosting providers</u>, we disclose Sensitive Personal Information, Identifiers, Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric, Sensory Data, Professional or Employment Related Information, and Inferences.

With our <u>advertising providers</u>, we disclose Identifiers, Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Professional or Employment Related Information, and Inferences.

#### 1.7. Sale of Personal Information:

We do not sell your personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

## 1.8. Sharing of Personal Information:

The CCPA defines sharing as renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. Some of the cookies that our site uses may constitute sharing under the CCPA. See our Cookie Policy for more details on cookies.

With our <u>advertising providers</u>, we share Identifiers, Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Professional or Employment Related Information, and Inferences.

See Section 2.5.2 below for instructions on how to opt out of sharing your personal information.

Our site is not aimed at minors, and we do not knowingly "share" the personal information of minors under 16 years of age without affirmative authorization.

#### 2. YOUR RIGHTS UNDER THE CCPA

The CCPA provides consumers (California residents) with specific rights regarding their personal information: the Right to Know, the Right to Delete, the Right to Correct, the Right to Limit use of Sensitive Personal Information, the Right to Opt-Out of the Sale of Personal Information or the Sharing of Personal Information, and the Right to Non-Discrimination. This section describes your CCPA rights and explains how to exercise those rights, if applicable.

# 2.1. Right to Know:

You have the right to request that we disclose certain information to you about our collection, use, and disclosures of your personal information over the past 12 months ("Right to Know"). Once we receive and verify your request, we will disclose to you:

- Categories of Personal Information Collected, Disclosed, and Shared
  - The categories of personal information we collected about you.
  - o The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- If we disclosed your personal information for a business purpose, the categories of personal information shared with each category of third-party recipients.
- o If we shared your personal information for cross-contextual behavioral advertising, the categories of personal information shared.
- Specific Information
  - o The specific pieces of personal information we collected about you.

We may deny your Request to Know if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under FCRA, GLBA, CalFIPA, or DPPA.

## 2.2. Right to Delete:

You have the right to request that we delete any of your personal information that we collected and retained, subject to certain exceptions ("Right to Delete"). Once we receive and verify your request, we will delete, de-identify, or aggregate your personal information (and direct our service providers to do the same), unless an exemption or exception applies.

We may deny your Request to Delete if retaining the personal information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Additionally, we may deny your Request to Delete if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under FCRA, GLBA, CalFIPA, or DPPA.

## 2.3. Right to Correct:

You have the right to request that we correct your personal information if it is inaccurate. Once we verify your identity and confirm that your personal information is inaccurate, we will correct your personal information (and direct our service providers to do the same).

We may deny your Request to Correct if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under FCRA, GLBA, CalFIPA, or DPPA.

# 2.4. Right to limit the use of Sensitive Personal Information

You have the right to direct a business that collects your sensitive personal information to limit its use to uses which are necessary to perform the services or provide the goods reasonably expected.

We only use Sensitive Personal Information to provide the goods and services requested by the consumer. We only collect Sensitive Personal Information that is exempt from the CCPA under FCRA, GLBA, and CalFIPA.

# 2.5. Right to Opt-Out and How to Submit a Request to Opt-Out:

The CCPA gives consumers the right to opt-out of 1) the sale of their personal information, 2) the sharing of their personal information for cross-context behavior advertising, or 2) for use in automated decision making.

#### 2.5.1. Sale of Personal Information

We do not sell your personal information. We do not sell personal information of minors under 16 years of age without affirmative authorization.

#### 2.5.2. Sharing Personal Information for Cross-Contextual Behavioral Advertising

To opt out of sharing for cross-contextual behavioral advertising see section 3.1. How to submit a request.

# 2.5.3. Automated Decision Making

The CCPA gives consumer the right to opt-out of the use of automated decision-making technology in connection with decisions about the consumer's work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. We do not use automated decision-making technology for personal information that is not covered by FCRA, GLBA, and CalFIPA.

# 2.6. Right to Non-Discrimination:

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.

# 3. SUBMITTING A REQUEST TO KNOW, REQUEST TO DELETE, REQUEST TO CORRECT or OPT-OUT OF SHARING FOR CROSS CONTEXTUAL BEHAVIORIAL ADVERTISING

# 3.1. How to submit a request:

To make a Request to Know, Request to Delete, Request to Correct or Opt-out of sharing for cross-contextual behavioral advertising, please contact us by either:

Calling us at (866) 703-8157,

Complete this form: <a href="www.advanceamerica.net/privacy-and-terms/contact-ccpa">www.advanceamerica.net/privacy-and-terms/contact-ccpa</a>

Only 1) you, 2) a person authorized by you to act on your behalf, or 3) an entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a request on behalf of your minor child.

You may only make a Request to Know twice within a 12-month period.

A Request to Know or Request to Delete or Request to Correct or to Opt-Out of Sharing your Information must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- If you are submitting a Request to Know specific pieces personal information (rather than categories), you will also need to submit a declaration under the penalty of perjury confirming that you are only requesting information about yourself.
- If you are submitting a Request to Correct specific pieces of personal information you will need
  to submit a declaration under the penalty of perjury confirming you are only correcting
  information about yourself.

## 3.2. Authorized Agents:

Before we can respond to a Request to Know or Request to Delete submitted by an authorized agent, we need to verify not only that person or entity's authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please email us at: CADataInquiry@advanceamerica.net and provide the following information:

- 1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
  - California Secretary of State entity details and written permission from the California resident (if the authorized agent is a business),
  - written permission from the California resident (if the authorized agent is an individual), or
  - a valid power of attorney
- 2. To verify your identity, please attach copies of the following to your request email:
  - Valid Government Issued ID (not expired) AND

- a utility bill, bank statement, or similar documentation to verify your name and address.
- 3. To verify the identity of the consumer for whom you are submitting the request, please attach <u>three or more</u> of the following with your request email:
  - name,
  - address,
  - date of birth,
  - email address,
  - phone number,
  - last 4 of the Social Security Number, or
  - last 4 of the account number
- 4. If you are submitting a Request to Know specific pieces personal information (rather than categories), the authorized agent will also need to submit a declaration under the penalty of perjury signed by the consumer whose information is being requested.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a request to verify the requestor's identity or authority to make the request.

# 3.3. Response Timing and Delivery Method:

We will acknowledge receipt of the request within 10 business days of its receipt. We will respond to a request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

# 4. DO NOT TRACK SIGNALS

Our site does not respond to Do Not Track signals configured in your web browser.

# 5. SOCIAL MEDIA

We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us.

#### 6. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this privacy policy at our discretion and at any time. When we make material changes to this privacy policy, we will notify you by email or through a notice on our website homepage.

#### 7. HOW TO CONTACT US

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

Privacy Support Phone: (888) 985-6974

Email Address: privacy@teampurpose.com

Website: <a href="https://www.advanceamerica.net/privacy-and-terms">www.advanceamerica.net/privacy-and-terms</a>
Postal Address: Advance America, Cash Advance Centers, Inc.

Attn: Information Privacy

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