

# California Privacy Policy

This California Privacy Policy supplements the information contained in the [GM Financial Online Privacy Policy](#), the [Gramm-Leach-Bliley Act \(“GLBA”\) Privacy Notice](#) and the [California Important Privacy Choices for Consumers Notice](#). GM Financial and its subsidiaries (collectively, “GM Financial”) adopt this policy to comply with the California Consumer Privacy Act of 2018 and its regulations (“CCPA”), and it applies solely to visitors, users and others who reside in the State of California.

For purposes of this policy, “Personal Information” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include de-identified or aggregated information.

Please be aware that GM Financial may be exempt from certain CCPA requirements based on exemptions including for: 1) certain Personal Information covered by or collected under industry-specific privacy laws including, but not limited to, the Fair Credit Reporting Act, the GLBA, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994; 2) Personal Information collected about a job applicant, employee, and contractor, or the emergency contact information of such persons, to the extent the information is collected and used solely within the context of the person acting as a job applicant, contractor, or an employee of GM Financial; and 3) Personal Information of a consumer who is a natural person acting as an employee, owner, director, officer, or contractor of a company or other business entity in the sole context of the business conducting due diligence regarding, or providing or receiving a product or service to or from us.

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## Collecting Personal Information

GM Financial has collected, maintained, and used the following categories (with examples) of consumer Personal Information in the preceding 12 months:

Categories of Personal Information collected in the preceding 12 months	Categories of sources from which the information was collected	Business/commercial purpose for which the information was collected	Categories of third parties/service providers with whom the business shares for a business/commercial purpose
<b>Identifiers</b>			
Registration Information for My Account <ul style="list-style-type: none"> <li>Such as first and last names, GM Financial account number, Social Security number (“SSN”), e-mail address, and vehicle information such as make, model, and vehicle identification number (“VIN”).</li> </ul>	Directly from you	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
Note Opening Information on Rightnotes.com <ul style="list-style-type: none"> <li>Such as first and last names, SSN or Tax Identification Number, Driver’s License number, address, date of birth, telephone number, and e-mail address.</li> </ul>	Directly from you		Service providers and affiliated entities where applicable to facilitate your note.
Identity Verification Information <ul style="list-style-type: none"> <li>Such as information from commercially available third-party sources, such as consumer reporting agencies and identity verification services.</li> </ul>	Identity verification services; Consumer reporting agencies		Service providers and affiliated entities where applicable to facilitate the processing of your credit application.
Social Media Information <ul style="list-style-type: none"> <li>Such as first and last names, user name, profile picture, user preferences such as “Like” button clicks, and the content of your posts, and other similar identifiers.</li> </ul>	Directly from you; Social networks		Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
<b>Account Information</b>			
Account servicing information <ul style="list-style-type: none"> <li>Such as payment and other transaction history, communication logging and history, correspondence records.</li> </ul>	Directly from you; Service providers	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Characteristics of protected classifications under California or federal law</b>			
Credit application information <ul style="list-style-type: none"> <li>Information you provide when completing an online GM Financial credit application or at a dealership, including your date of birth, income information, etc.</li> </ul>	Directly from you; Dealerships; Operating systems and platforms	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
Driver’s License Information <ul style="list-style-type: none"> <li>Date of birth, gender/sex, race, photograph, etc.</li> </ul>	Directly from you; Dealerships	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
<b>Commercial Information</b>			
Contract and related vehicle information <ul style="list-style-type: none"> <li>Information about the vehicle you purchased or leased including year, make, model, odometer information, and VIN. Retail installment sales contract or lease agreement information you enter into with a dealership or a direct promissory</li> </ul>	Directly from you; Dealerships; Operating systems and platforms	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.

note you enter into with us for a direct vehicle loan.			
<b>Credit Application Information</b> <ul style="list-style-type: none"> <li>Information you provide when completing an online GM Financial credit application or at a dealership, including your first and last names, physical address, residence type, length of time at current address, monthly rent or mortgage amount, home, mobile and business telephone numbers, e-mail address, date of birth, Social Security number, employment status, job title, employer name, employer phone number, length of time at place of employment, and income information.</li> </ul>	Directly from you; Dealerships; Operating systems and platforms		Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
<b>Credit Report Information</b> <ul style="list-style-type: none"> <li>Information provided by credit reporting agencies regarding your credit profile and history.</li> </ul>	Credit reporting agencies		Service providers and affiliated entities where applicable to facilitate the processing of your credit application.
<b>Audio, electronic, visual, thermal, olfactory, or similar information</b>			
<b>Connected vehicle information</b> <ul style="list-style-type: none"> <li>Vehicle diagnostics, odometer, vehicle use, driving behavior, etc.</li> </ul>	Affiliated entities	Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Recordings</b> <ul style="list-style-type: none"> <li>Call recordings from servicing calls</li> <li>On premises visual recordings</li> </ul>	Directly from you; Operating systems and platforms	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.  Government entities as required.
<b>Geolocation data</b>			
<b>Vehicle location data</b> <ul style="list-style-type: none"> <li>Vehicle location data for certain collection, recovery and servicing purposes.</li> </ul>	Affiliated entities	Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Internet or other electronic network activity information</b>			
<b>Online information</b> <ul style="list-style-type: none"> <li>Such as device ID, device and platform type, operating system, IP address, browser type and version, domain name, and referring website/service/application.</li> </ul>	The device or computer you use to access the site	Refer to Exhibit B	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Professional or employment-related information.</b>			
<b>Credit Application Information</b> <ul style="list-style-type: none"> <li>Such as first and last names, physical address, residence type, length of time at current address, monthly rent or mortgage amount, home, mobile and business telephone numbers, e-mail address,</li> </ul>	Directly from you; Dealerships; Operating systems and platforms	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.

date of birth, SSN, employment status, job title, employer name, employer phone number, length of time at place of employment, and income information.			
<b>Education Information</b>			
Details of your education, degree, level of education	Directly from you; Dealerships	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
<b>Inferences</b>			
Social Media Information <ul style="list-style-type: none"> <li>Information that you send directly to GM Financial or post to any of GM Financial's social media websites for publication on the Internet, such as your first and last names, user name, profile picture, user preferences such as "Like" button clicks, and the content of your posts.</li> </ul>	Directly from you; Social networks	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
<b>Categories of personal information described in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))</b>			
Identifiers <ul style="list-style-type: none"> <li>Identifiers as noted in above examples including name, SSN, address, telephone number, Driver's License or state identification card number.</li> </ul>	See identifiers above	See identifiers above	See identifiers above
Commercial Information <ul style="list-style-type: none"> <li>Commercial Information as noted in the above examples including signature, insurance policy number, education, employment, and employment history.</li> </ul>	See commercial information above	See commercial information above	See commercial information above
Bank Account/Financial Information <ul style="list-style-type: none"> <li>Bank account number and other financial information provided when you make payments to us.</li> </ul>	Directly from you	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.

### **Disclosure or Sale of Personal Information**

The CCPA provides consumers with the right to opt out of the sale of Personal Information by a business. However, we do not sell California consumers' Personal Information. In addition, in the preceding twelve (12) months, we have not sold any California consumers' Personal Information. GM Financial has disclosed for a business or commercial purpose in the preceding 12 months the categories of Personal Information to third parties or service providers described above. We do not collect or sell the Personal Information of minors under 16 years of age without affirmative authorization.

### **California Privacy Rights**

If you are a California consumer, under the CCPA, you have the right, subject to exceptions, to request that we:

- Delete Personal Information about you which we have collected or maintained.
- Disclose the following, with respect to Personal Information we have collected or shared in the 12 months preceding your request:
  - The categories of Personal Information we have collected about you;
  - The categories of sources from which the Personal Information was collected;
  - The business or commercial purpose for which we collected the Personal Information;
  - The categories of third parties we share Personal Information with;
  - The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of third parties to whom we disclosed that particular category of Personal Information.

### **Authorized Agents**

You may designate an authorized agent (a natural person or a business entity registered with the Secretary of State) to make a request on your behalf. The designated agent may be required to provide us your written authorization to act on your behalf, or

other legal documentation to prove the individual is acting on your behalf. We may also: 1) confirm your identity by verifying certain identifying information, and 2) confirm directly with you that you provided the authorized agent permission to submit the request.

### **Non-Discrimination**

We will not discriminate against you because you exercise any of your rights as described in this section, including but not limited to, by: 1) denying you goods or services; 2) charging you different prices or rates for goods or services; 3) providing a different level or quality of goods or services to you; or 4) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

### **How to Exercise Your Rights**

To exercise any right described in this policy, please submit a request at [www.gmfinancial.com/californiaprivacy](http://www.gmfinancial.com/californiaprivacy) or contact us toll free at 866-537-8843.

We will request certain pieces of information about you to verify your identity including first and last name, last four digits of Social Security number, address, e-mail address or phone number, and date of birth if you are a customer, have applied for credit, or are a personal guarantor. For some request types, less information will be required to verify, and will depend upon the type of information requested. For requests pertaining to household Personal Information for specific pieces of information or for deletion, all members of the household must be verified.

GM Financial will disclose (where required to do so) and deliver the required information free of charge within 45 days of receiving a verifiable consumer request from the consumer. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary, and we will notify you if such an extension is necessary.

GM Financial is not required to provide personal information to a consumer more than twice in a 12-month period.

For questions or concerns about our privacy policies, notices and practices or if you would like a copy of this policy mailed, e-mailed or faxed to you, or if you would like to access this policy in an alternative format, please contact us at 866-537-8843.

**Last Revised: June 30, 2022**

## Exhibit A

### Business/commercial purpose for which the information was collected

Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.

Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

Debugging to identify and repair errors that impair existing intended functionality.

Undertaking internal research for technological development and demonstration.

Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

Comply with federal, state, or local laws.

Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.

Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law.

Exercise or defend legal claims.

## Exhibit B

### Business/commercial purpose for which the information was collected

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.

Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

Debugging to identify and repair errors that impair existing intended functionality.

Short-term, transient use, provided that the Personal Information 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.

Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

Undertaking internal research for technological development and demonstration.

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Comply with federal, state, or local laws.

Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.

Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law.

Exercise or defend legal claims.