

CCPA Privacy Notice / Notice At Collection

Last Updated February 2023

Maintaining the privacy and security of your personal information is Service Finance Company's ("SFC") highest priority. In doing so, we want to provide transparency regarding how and why your data is collected, how it is used, with whom it may be shared, and how long it is kept. This notice, as well as [SFC's Consumer Privacy Notice](#) and [Statement of Online Privacy Practices](#) informs consumers how we will interact with your personal information.

The purpose of this Notice at Collection and CCPA Privacy Notice ("Notice") is to provide you with timely notice, at or before the point of collection, of the details about our practices concerning the privacy of your personal information. This Notice is directed to consumers who reside in the state of California ("consumers" or "you") and relates to personal information covered by the California Consumer Privacy Act (CCPA). Specifically, this Notice provides comprehensive information about our online and offline practices, along with details concerning how you may exercise your California privacy rights and make requests to access, correct or delete the information that SFC holds about you. We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing these categories.

Please note that SFC adheres to an exemption within the CCPA for data collected pursuant to the Gramm-Leach-Bliley Act (GLBA). This Notice and the rights described do not apply to information we collect when you apply for or obtain our financial products and services for personal, family, or household purposes, which is subject to [SFC's Consumer Privacy Notice](#).

The following charts provide specifics about SFC's practices related to the collection, use and selling or sharing of personal information:

General Personal Information

Categories of Personal Information Collected & Disclosed	Purpose for Collection	Purpose for Disclosure
A. Identifiers: For example, real name or alias, address, online identifier, IP address, email address, account name, SSN, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none">• Ensure your identity and protect the security of your personal and account information from unauthorized access• Process transactions on your account• Respond to product applications and questions• Fulfill regulatory requirements• Carry out other day-to-day business operations, such as to comply with applicable laws; disclose to contractors, business partners and other third parties under specific contracts and agreements; perform	<ul style="list-style-type: none">• All purposes from the "Purpose for Collection" and• To share personal information with businesses with which we partner to offer products and services for our clients or prospective clients, such as bill pay partners

	<p>compliance activities; conduct credit reporting activities</p> <ul style="list-style-type: none"> Prevent and detect fraud 	
<p>B. Personal Information Categories from Cal. Civ. Code § 1798.80I: For example, name, signature, SSN, physical characteristics or description, address, phone number, passport number, driver's license or state ID card number, account numbers, education, employment, employment history, credit or debit card numbers, or any other financial, medical or health insurance information.</p>	<ul style="list-style-type: none"> Ensure your identity and protect the security of your personal and account information from unauthorized access Process transactions on your account Respond to product applications and questions Fulfill regulatory requirements Carry out other day-to-day business operations, such as to comply with applicable laws; disclose to contractors, business partners and other third parties under specific contracts and agreements; perform compliance activities; conduct credit reporting activities Prevent and detect fraud Manage hiring and ongoing employment needs 	<ul style="list-style-type: none"> All purposes from the "Purpose for Collection" and To share personal information with businesses with which we partner to offer products and services for our clients or prospective clients, such as bill pay partners
<p>C. Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin), age (40 and over), gender, sexual orientation, medical condition, ancestry, pregnancy (includes childbirth, breastfeeding and/or related medical conditions), familial status, disability, veteran status, or genetic information.</p>	<p>Manage hiring and ongoing employment needs</p>	<p>All purposes from the "Purpose for Collection"</p>
<p>D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Respond to product applications</p>	<p>All purposes from the "Purpose for Collection"</p>
<p>E. Biometric Information: For example, physiological, biological or behavioral characteristics that can be used to</p>	<p>For secure sign-on methods on your device</p>	<p>SFC does not store or disclose this information</p>

establish individual identity, including fingerprints or facial features.		
<p>F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement</p>	<ul style="list-style-type: none"> • To analyze our site usage and enhance the user's experience, including: <ul style="list-style-type: none"> ○ Diagnosing server problems ○ Alerting users of any possible software compatibility issues ○ To help us make decisions about how various technologies are used and to identify usage trends. 	All purposes from the "Purpose for Collection"
<p>G. Geolocation Data: For example, information that can be used to determine a device's physical location</p>	<ul style="list-style-type: none"> • Protect against risks to security: <ul style="list-style-type: none"> ○ Monitor network activity logs ○ Detect security incidents and conduct data security investigations ○ Protect against malicious, deceptive, fraudulent, or illegal activity 	All purposes from the "Purpose for Collection"
<p>H. Sensory Data or Recordings: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household</p>	<ul style="list-style-type: none"> • Fulfill regulatory requirements • Carry out other day-to-day business operations, such as to comply with applicable laws; disclose to contractors, business partners and other third parties under specific contracts and agreements; perform compliance activities 	All purposes from the "Purpose for Collection"
<p>I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.</p>	<ul style="list-style-type: none"> • Manage hiring and ongoing employment needs • Manage teammate and organizational performance and staffing 	All purposes from the "Purpose for Collection"
<p>J. Education Information (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R.</i></p>	Manage hiring and ongoing employment needs	All purposes from the "Purpose for Collection"

<p>Part 99)): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual's identity in relation to an educational institution either directly or indirectly through linkages with other information.</p>		
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Sensitive Personal Information

Categories of Sensitive Personal Information	Purpose for Collection	Purpose for Disclosure
<p>SSN, Driver's License, State ID Card, Passport Number</p>	<ul style="list-style-type: none"> • Ensure your identity and protect the security of your personal and account information from unauthorized access • Process transactions on your account • Respond to product applications and questions • Fulfill regulatory requirements • Carry out other day-to-day business operations, such as to comply with applicable laws; disclose to contractors, business partners and other third parties under specific contracts and agreements; perform compliance activities; conduct credit reporting activities • Prevent and detect fraud 	<ul style="list-style-type: none"> • All purposes from the "Purpose for Collection" and • To share personal information with businesses with which we partner to offer products and services for our clients or prospective clients, such as bill pay partners
<p>Account Login, financial account, debit or credit card number when provided with any security or access code, password or credentials allowing access to an account</p>	<ul style="list-style-type: none"> • Ensure your identity and protect the security of your personal and account information from unauthorized access • Process transactions on your account • Prevent and detect fraud 	<p>All purposes from the "Purpose for Collection"</p>
<p>Precise geolocation</p>	<p>Protect against risks to security:</p> <ul style="list-style-type: none"> • Monitor network activity logs • Detect security incidents and conduct data security investigations • Protect against malicious, deceptive, fraudulent, or illegal activity 	<p>All purposes from the "Purpose for Collection"</p>
<p>Racial or ethnic origin</p>	<p>Manage hiring and ongoing employment needs</p>	<p>All purposes from the "Purpose for Collection"</p>

Contents of a consumer’s mail, email and text messages (unless SFC is the intended recipient)	SFC does not collect contents of a consumer’s mail, email and text messages if SFC is not the intended recipient	N/A
Genetic Data	SFC does not collect genetic data	N/A
Biometric information for the purpose of unique identification	For secure sign-on methods on your device	SFC does not store or disclose this information
Health information	Manage ongoing employment needs, such as benefits	All purposes from the “Purpose for Collection”
Information concerning sex life or sexual orientation	SFC does not collect information concerning sex life or sexual orientation	N/A

What we Sell to Third Parties or Share with Third Parties for Cross-Context Behavioral Advertising and What we Share with Third Parties for Business Purposes

SFC does not “sell” or “share” information for cross-contextual behavioral advertising under California law. We have shared personal information for business purposes with third parties in the preceding 12 months as disclosed in the table below.

General Personal Information

Categories sold to or shared with third parties over the last 12 months	Categories of third parties to whom this category of personal information has been sold or shared	Categories of Third Parties to whom the information was shared for business purposes
A. Identifiers	N/A	<ul style="list-style-type: none"> • Affiliates and other entities in the SFC family • Businesses with which we partner to offer products and services for our clients or prospective clients, such as joint marketing partners or bill pay partners • Service providers that provide various services to us, such as those we used to help detect and prevent fraud, improve our online services and to better market and advertise our services to you • Other parties when you authorize or direct us to share your information • Credit reporting agencies to report on or learn about your financial circumstances as permitted by law

		<ul style="list-style-type: none"> • Government entities and other third parties as needed for legal or similar purposes • To exercise or defend legal claims
B. Personal Information Categories from Cal. Civ. Code § 1798.80(e)	N/A	<ul style="list-style-type: none"> • Affiliates and other entities in the SFC family • Businesses with which we partner to offer products and services for our clients or prospective clients, such as joint marketing partners or bill pay partners. • Service providers that provide various services to us, such as those we used to help detect and prevent fraud, improve our online services and to better market and advertise our services to you • Other parties when you authorize or direct us to share your information • Credit reporting agencies to report on or learn about your financial circumstances as permitted by law • Government entities and other third parties as needed for legal or similar purposes • To exercise or defend legal claims
C. Characteristics of CA or Federal Protected Classifications	N/A	<ul style="list-style-type: none"> • Affiliates and other entities in the SFC family • Other parties when you authorize or direct us to share your information
I. Professional or Employment-Related Information	N/A	Affiliates and other entities in the SFC family
J. Education Information	N/A	Affiliates and other entities in the SFC family

Sensitive Personal Information

Categories sold to or shared with third parties over the last 12 months	Categories of third parties to whom this category of personal information has been sold or shared	Categories of third parties to whom the information was shared for business purposes
Social Security Number, Driver's License, State Identification Card, or Passport Number	N/A	<ul style="list-style-type: none"> • Affiliates and other entities in the SFC family • Businesses with which we partner to offer products and services for our clients or prospective clients, such as joint marketing partners or bill pay partners

		<ul style="list-style-type: none"> • Service providers that provide various services to us, such as those we used to help detect and prevent fraud, improve our online services and to better market and advertise our services to you • Other parties when you authorize or direct us to share your information • Credit reporting agencies to report on or learn about your financial circumstances as permitted by law • Government entities and other third parties as needed for legal or similar purposes • To exercise or defend legal claims
Racial or ethnic origin	N/A	Affiliates and other entities in the SFC family
Health information	N/A	Affiliates and other entities in the SFC family

Notice of Right to Opt Out of Sale / Sharing

SFC has not sold personal information to third parties in the preceding 12 months, including personal information of minors under the age of 16. Therefore, there is not an opt-out for the sale of data provided on our website, since there is no activity from which to opt out.

Notice of Right to Limit Use of Sensitive Personal Information

SFC only collects/processes sensitive personal information without the purpose of inferring characteristics about a consumer, therefore there is not an opt-out for the use of sensitive personal information.

Retention of Personal Information

SFC has established product and business-level criteria for retention and disposal according to business requirements, laws, regulations, and applicable industry standards.

Sources of Personal Information

SFC collects information from various sources, including:

- *Directly from you or your guardians/representatives*
- *Service providers that support our business operations (e.g., data analytics providers)*
- *Websites and mobile applications*
- *Our affiliates*
- *Outside merchants or business partners such as dealer associations or manufacturers*
- *Public records or publicly available data*
- *Data brokers*
- *Government entities*

Consumer Rights Under the CCPA

Right to Know / See Data Request

You have the right to request that SFC disclose categories or specific pieces of information we have collected about you over the last 12 months, the categories of sources from which that information was collected, the business or commercial purpose(s) for which the information was

collected, sold, or shared with third parties for cross context behavioral advertising, and the categories of third parties with whom we share personal information.

Right to Correct

You have the right to request correction of inaccurate information maintained by SFC. In many instances, such updates are best made by logging into your online account or employee portals or calling 866-703-3140, and some corrections may require specific documentation to be provided as required by law. If you provide us documentation, it will only be used or maintained for the purpose of correcting the information and complying with our recordkeeping requirements under the CCPA. SFC also provides links and the privacy request line as described below.

Right to Delete

You have the right to request deletion of personal information that SFC has collected, subject to certain exceptions. For example, we may deny your request if retaining the information is necessary for us to complete a transaction you requested or comply with our legal obligations.

Submitting a Verified Consumer Request

Consumers are welcome to submit right to know, correction, or deletion requests by visiting our Consumer Rights Request Portal, hosted by One Trust:

- To submit a request for yourself, click [here](#)
- To submit a request on behalf of another individual, click [here](#)

Individuals are also welcome to submit requests by calling 866-703-3140.

All requests must be verified prior to receiving a response, using SFC authentication protocols. Requesters will be asked to supply certain basic Personal Information to enable us to verify the request against our records, such as name, Social Security number, and address. Information submitted for verification purposes will only be used to verify the requestor's identity and/or authority to make a request on another's behalf.

Requests made on another person's behalf can only be accepted upon receipt of documentation that the requestor is an authorized agent, parent, or legal guardian of the consumer whose information is being requested. This will require the submission of a valid Power of Attorney, Birth Certificate, approved SFC authorization form, Guardianship Order, or other court order granting authority to receive information, as appropriate.

Upon submission of a request, consumers will receive an initial confirmation of receipt within 10 days. We will respond to your request within 45 days (unless an extension of up to 45 additional days is requested, upon which the consumer will receive notice and an explanation for the extension).

Non-Discrimination

The submission of any CCPA request will have no impact on the service and/or pricing you receive from SFC. It will not result in any denial of goods or services, or different prices, rates or quality of goods or services, nor will it result in retaliation against an employee, applicant, or independent contractor.

Consumers Under 16 Years of Age

SFC products and services are not intended for consumers under the age of 16, and we do not knowingly collect information from children under the age of 16 without consent. SFC does not knowingly sell the personal information of minors under the age of 16 or share such information for cross-contextual advertising.

Privacy Center for Requests

Through the SFC [website](#), you can submit requests to see, delete and edit information we've collected.

Updates

This Notice may be revised from time to time, so please review this page periodically. Any changes will become effective when we post the revised notice on the site (please note the effective date listed at the top of this page). Our annual report showing request metrics for the previous calendar year can be found [\[here\]](#).

Contact Us

If you have any questions or comments on this notice or our privacy practices generally, please contact us at 866-703-3140 You can also visit [SFC's Privacy Notice page](#) for additional information.