

## California Notice at Collection

Rev 3/2024

### California Notice at Collection

This California Notice at Collection (the "Notice at Collection") is for California Residents only. This Notice at Collection describes:

- The personal information that Credit One Bank, N.A. ("we," "our," or "us") collects in the course of its business, explains how this information is collected, used, sold, disclosed, shared, and retained,
- The rights provided by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act ("CCPA") to California Residents ("consumers" or "you") regarding their personal information, and
- How consumers can exercise those rights.

### What is Personal Information?

We may collect, use, or disclose your personal information. Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you ("personal information"). "Personal information" does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information.

With a limited exception, and as noted in our California Consumer Privacy Act Statement, certain provisions of the CCPA do not apply to personal information covered by or collected under industry-specific federal and state privacy laws including, but not limited to, the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

### Personal Information We Collect, Use, Sell, Share, Disclose, and Retain

The CCPA requires us to disclose certain information regarding our collection, use, sale, sharing, disclosure, and retention of personal information.

### Collecting Your Personal Information

We collect the following categories of personal information:

- **Identifiers.** This may include real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- **Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).** This may include a name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Characteristics of protected classifications under California or federal law.** This may include race, religion, sex, disability, marital status, veteran status, or citizenship.
- **Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.** This may include records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric information.** This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity, including fingerprints.
- **Internet or other similar network activity.** This may include browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation data.** This may include physical location or movements.
- **Audio, electronic and similar information.** This may include call recordings.
- **Professional or employment-related information.** This may include employment status and current or past job history or performance evaluations.
- **Education information.** This may include student records and directory information.
- **Inferences drawn from other personal information.** This may include information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

- **Sensitive personal information.** This may include a social security, driver's license, state identification card, or passport number. This term, as used in this California Privacy Statement, also refers to geolocation data and characteristics of protected classifications under California or federal law.

We collect personal information from the following categories of sources:

- You (or your representative)
- Data Analytics Providers
- Marketing Partners
- Our websites and mobile applications
- Third-party websites, such as social media websites
- Service Providers
- Credit reporting agencies
- Government agencies

We may collect and disclose your personal information for the following business or commercial purposes:

- **Account Services:** We use personal information to offer our account services, including: (1) establishing, maintaining, supporting, and servicing an account you may have opened with us and for which you provided the information or that you may have applied for or established with us; (2) providing services, products, or information you may have requested from us; and (3) performing services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, or providing similar services on our own behalf or on the service provider's behalf.
- **Employee Services:** We use personal information to perform background checks necessary to comply with licensing requirements, to perform reference checks, to verify eligibility to work in the United States, for contact purposes, to assess your qualification for employment, to conduct performance evaluations, for payroll and budgeting purposes, for implementation of employee benefits, for internal organizational purposes to establish proper accommodations for sick time, PTO, leaves of absences, or emergency situations, and to conduct health screenings as allowed by OSHA and the CDC to protect the safety of our employees during pandemic situations.
- **Security and Fraud Detection:** We use personal information for our security and fraud detection services including: detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for that activity.
- **Debugging:** We use personal information to engage in debugging to identify and repair errors that impair existing intended functionality.
- **Improvement of Products and Services:** We use personal information to verify, maintain, and improve our products and services.
- **Internal Research:** We use personal information for our internal research related to technological development and demonstration.
- **Advertising and Marketing Services:** We use personal information to provide advertising or marketing services on our own behalf.
- **Audits:** We use personal information to audit current interactions with you and related transactions (e.g., counting and verifying ad impressions, auditing compliance).
- **Merger/Acquisition/Bankruptcy, etc.:** We may use your personal information as part of a merger, acquisition, bankruptcy, or other transaction where a third party assumes control of us.
- **Commercial/Economic Interests:** We use personal information to advance our commercial or economic interests.
- **Legal Obligations:** We use personal information to comply with legal obligations.

#### **Sale and Sharing of Personal Information and Disclosure of Sensitive Personal Information**

In the past 12 months, we have not "sold" or "shared" personal information subject to the CCPA, including personal information of minors under the age of 16, nor do we intend to do so in the future. We do not and will not sell or share your personal information. If that changes, we will notify you and provide you with any opt-out rights required under the CCPA. For purposes of this Notice at Collection, "sold" means the disclosure of personal information to a third-party for monetary or other valuable consideration, and "shared" means the disclosure of personal information to a third-party for cross-context behavioral advertising.

We also have not used or disclosed Sensitive Personal Information outside of the exceptions allowed for in the CCPA and its implementing regulations. If that changes, we will notify you and provide you with any opt-out rights required under the CCPA.

#### **Disclosing Your Personal Information for a Business or Commercial Purpose**

We may disclose your personal information to employees, service providers, or contractors in order to carry out specific business or commercial purposes. In the preceding 12 months, we have disclosed the following categories of consumer personal information for business or commercial purposes to service providers and the following categories of third parties:

- **Identifiers** to Data Analytics Providers, Marketing Partners, credit reporting agencies, Third Party Websites such as social media companies, human resource vendors, government agencies, third party auditors, and legal counsel.
- **Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))** to Data Analytics Providers, Marketing Partners, credit reporting agencies, Third Party Websites such as social media companies, human resource vendors, government agencies, third party auditors, and legal counsel.
- **Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies** to Marketing Partners, credit reporting agencies, Third Party Websites such as social media companies, and legal counsel.
- **Biometric information** to human resource vendors and government agencies.
- **Internet or other similar network activity** to Data Analytics Providers, Marketing Partners, Third Party Websites such as social media companies, and legal counsel.

- **Characteristics of protected classifications under California or federal law** to human resource vendors, government agencies, and third party auditors.
- **Geolocation data** to Data Analytics Providers, Marketing Partners, Third Party Websites such as social media companies, and legal counsel.
- **Professional or employment-related information** to human resource vendors and government agencies.
- **Education information** to human resource vendors.
- **Inferences drawn from other personal information** to Data Analytics Providers, Marketing Partners, Third Party Websites such as social media companies, and legal counsel.

#### **How Long We Retain Your Personal Information**

We store personal information for as long as we believe is reasonably necessary or appropriate to fulfill our business purposes or to comply with applicable law, audit requirements, regulatory requests, or orders from competent courts.

To view our California Consumer Privacy Act Statement, click on the following link: <https://www.creditonebank.com/legal/california-consumer-privacy-act-statement>