

Privacy

California Consumer Privacy Act Statement

Rev 3/2024

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This California Consumer Privacy Act Statement (the "California Privacy Statement") is for California Residents only and supplements the Gramm-Leach-Bliley Act Privacy Policy ("Privacy Policy"). This policy 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.

In addition, federal privacy laws protect your financial personal information. Please see our [Privacy Policy](#) for more information.

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 other sections of this California Privacy 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

In the past 12 months, we have collected 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.

In the past 12 months, we have collected 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 Disclosure, "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 fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests, or orders from competent courts.

Your Rights under the CCPA

As described in more detail below, the CCPA provides you with certain rights regarding the collection, use, and disclosure of your personal information. The CCPA also provides consumers with certain rights (for example, opt-out rights) if a business sells or shares personal information, which we do not do.

With a limited exception, the rights described below do not apply to certain personal information, including, for example, covered by or collected under industry-specific federal or state privacy laws including, but not limited to, the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act. For more information, please see our Privacy Policy.

The Right to Know About Personal Information Collected, Shared, Sold, or Disclosed

When we collect information, you have the right to know:

- The categories of personal information to be collected, the purposes for which the categories of personal information are collected or used, and whether that information is sold or shared;
- The categories of sensitive personal information to be collected, the purposes for which the categories of sensitive personal information are collected or used, and whether that information is sold or shared; and
- The length of time the business intends to retain each category of personal information, including sensitive personal information.

You should have received this information at or before the point that we collected information from you.

You also have the right to request that we provide you with certain information about the personal information we collect, use, or disclose, as well as the categories and specific pieces of information that we have collected about you. Specifically, you have the right to request the following:

- The specific pieces of personal information we have collected about you.
- The categories of personal information we have collected about you, and:
 - The categories of sources from which the personal information was collected.
 - Our business or commercial purpose for collecting the personal information.
 - The categories of third parties to whom we disclose personal information.
 - If we disclosed your personal information for a business purpose, the categories of personal information that we disclosed about you and the categories of third parties to whom we disclosed that personal information for a business purpose.

However, there is certain information that we will not disclose to you. This information includes but is not limited to your social security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answer, or unique biometric data generated from measurements or technical analysis of human characteristics.

The Right to Request Deletion of Personal Information

You have the right to request that we delete any personal information that we have collected from you and maintained about you unless there is a reason we need to keep the information. Once we receive and confirm your verifiable consumer request, if we determine that we must comply with a deletion request and delete your personal information from our records, we will also direct any service providers, contractors, and other third parties we work with to delete your personal information from their records. If we store any of your personal information in our archived or back-up systems, we will delete your information once the systems are accessed, restored, and/or used.

Please note that we may deny your deletion request for a number of different reasons, which are identified in the CCPA.

The Right to Request Correction of Inaccurate Personal Information

You have the right to request that we correct any inaccurate personal information that we have collected from you and/or maintained about you. Once we receive and confirm your verifiable consumer request, if we determine that we must comply with a correction request and correct inaccuracies in – or, as may be appropriate, delete – your personal information from our records, we will also direct any service providers we work with to correct or delete your personal information from their records. If we store any of your personal information in our archived or back-up systems, we will correct or delete your information once we access, restore, and/or use the systems.

The Right to Non-Discrimination or No Retaliation

We will not discriminate or retaliate against you for exercising any of your CCPA rights. For example, unless otherwise permitted by law, 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 with a different level or quality of goods or services.
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Other Rights

You also have the right to opt-out of the sale/sharing of your personal information and to limit the use or disclosure of any Sensitive Personal Information. We do not sell or share personal information or use or disclose any Sensitive Personal Information other than as allowed by the CCPA and its implementing regulations.

Exercising Your Rights under the CCPA

Submitting a Verifiable Request to Know, Correct, or Delete Personal Information

To exercise your Right to Know, Correct, or Delete your personal information, please submit a verifiable consumer request to us by:

- Phone: 1-877-791-4133
- Email: CAprivacy@creditone.com

To submit a verifiable consumer request, you (or your authorized agent) will be asked to provide:

- If you are a current or former customer, you must provide the following information:
 1. First and Last Name,
 2. Home Address,
 3. Email Address,
 4. Telephone Number, and
 5. Credit One Bank Account Number
- If you are not a current or former customer, you must provide
 1. All the information required for a current customer (not including a Credit One Bank Account Number)
 2. A copy of the front and back of your Driver's License or State ID card, mailed to:

Credit One Bank

ATTN: CCPA - Compliance

PO BOX 98838

Las Vegas, NV 89193-8838

Only you (or an authorized agent) may make a verifiable consumer request.

Verifying Your Identity

Once you submit your verifiable consumer request, we will verify your identity by matching the information you provided us with information in our systems. If you submit a request to know specific pieces of personal information, delete certain information, or correct certain information, in addition to verifying your identity with information we have on file, you also may be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose personal information is the subject of the request. If we are unable to respond to your request for specific pieces of information, we will evaluate your request as if it is a request to know the categories of personal information that we have collected about you.

If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account and we will also require you to re-authenticate yourself before we disclose your personal information. If we suspect fraudulent or malicious activity on or from your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the personal information.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by law.

Generally, if we are unable to verify your identity, we will deny your request and inform you of our inability to verify your identity and explain why we were unable to do so.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

Responding to Your Request to Know, Correct, or Delete

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 business days and provide you with additional information about how we will process the request. Our goal is to respond to your request within 45 calendar days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 calendar days) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take more than 45 calendar days to respond. Any disclosures we provide will cover information collected and maintained since January 1, 2022. If we are unable to comply with a given request, we will provide you with a response explaining why we have not taken action on your request and identifying any rights you may have to appeal the decision.

We will not charge you or your authorized agent to verify your identity. In addition, we will not charge you or your authorized agent a fee to process or respond to your verifiable consumer 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.

Authorized Agent for Requests

You may designate an authorized agent to make a request on your behalf. Unless you have a power of attorney, if you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request, you must provide the authorized agent with written and signed permission to do so, and either verify your own identity directly with us, or directly confirm that you provided the authorized agent with permission to submit the request. We may deny a request from an authorized agent that does not submit proof that they are authorized to act on your behalf.

Changes to Our California Privacy Statement

We are required by law to update this California Privacy Statement at least once each year. This California Privacy Statement was last updated on March 1, 2024.

Contact Information

If you have any questions regarding our privacy policies, our California Privacy Statement, the ways in which we collect, use, and disclose your personal information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Phone: 1-877-791-4133

Email: CAprivacy@creditone.com

Postal Address: Credit One Bank, N.A.
ATTN: CCPA - Compliance
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