

California Privacy Notice of Collection of Business-Related Personal Information

Last Updated: December 27, 2023

I. Introduction.

Your privacy is important to us at American Credit Acceptance, LLC (“ACA,” “we,” “us,” or “our”), and we are committed to safeguarding, preserving, and respecting your privacy rights.

This Business-to-Business Privacy Notice (the “Notice”) is designed to explain the personal information we collect and process about California residents when you interact with us in a professional capacity in the context of a business-to-business relationship (“B2B Information”). For purposes of this Notice, B2B Information means information that would qualify as personal information as defined under the California Consumer Privacy Act (“CCPA”). For more information regarding our processing of information, please see our Website Privacy Policy, available at <https://americancreditacceptance.com/privacy-policy/> or contact us through the Contact Us section, below.

II. What B2B Information Do We Collect?

The below examples are illustrative categories of B2B Information from the CCPA and do not reflect the specific pieces of information we collect.

In the previous 12 months, we have collected the following categories of B2B Information:

Categories as defined by CA Law:	Examples:	Reasons for Collection:
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	<ul style="list-style-type: none">• To contact you regarding our services and your requests;• To better understand our audience;• To advertise opportunities, services, or special events that we think may be of interest to you;• To measure the effectiveness of our campaigns;• To carry out transactions;• To carry out our obligations and enforce our rights.

Categories as defined by CA Law:	Examples:	Reasons for Collection:
B. Personal Information	<p>A name, signature, license or state identification card number, insurance policy number, bank account number, or any other financial information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> • To contact you regarding our services and your requests; • To better understand our audience; • To advertise opportunities, services, or special events that we think may be of interest to you; • To measure the effectiveness of our campaigns; • To carry out transactions; • To carry out our obligations and enforce our rights.
D. Commercial Information	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • To contact you regarding our services and your requests; • To better understand our audience; • To advertise opportunities, services, or special events that we think may be of interest to you; • To measure the effectiveness of our campaigns; • To carry out transactions; • To carry out our obligations and enforce our rights.
F. Internet or other Similar Network Activity	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<ul style="list-style-type: none"> • To contact you regarding our services and your requests; • To better understand our audience; • To advertise opportunities, services, or special events that we think may be of interest to you; • To measure the effectiveness of our campaigns; • To carry out transactions; • To carry out our obligations and enforce our rights.
G. Geolocation Data	<p>Physical location or movements.</p>	<ul style="list-style-type: none"> • To contact you regarding our services and your requests; • To better understand our audience; • To advertise opportunities, services, or special events that we think may be of interest to you; • To measure the effectiveness of our campaigns; • To carry out our obligations and enforce our rights.

Categories as defined by CA Law:	Examples:	Reasons for Collection:
H. Sensory Data	Audio, electronic, visual, or similar information.	<ul style="list-style-type: none"> To contact you regarding our services and your requests.
I. Professional or Employment-Related Information	Current or past job history.	<ul style="list-style-type: none"> To contact you regarding our services and your requests; To better understand our audience; To advertise opportunities, services, or special events that we think may be of interest to you; To measure the effectiveness of our campaigns; To carry out our obligations and enforce our rights.
K. Inferences Drawn of the Consumer	Inferences drawn from B2B Information identified above to create a profile about a consumer reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> To contact you regarding our services and your requests; To better understand our audience; To advertise opportunities, services, or special events that we think may be of interest to you; To measure the effectiveness of our campaigns; To carry out our obligations and enforce our rights.
L. Sensitive Personal Information	<p>Personal information that reveals (a) driver's license, state identification card; (b) account log-in, financial account, password, or credential allowing access to an account; (c) precise geolocation.</p> <p>Some Sensitive Personal Information included in this category may overlap with other categories. Please note that we do not use your Sensitive Personal Information to infer characteristics about you.</p>	<ul style="list-style-type: none"> As required to carry out transactions; To carry out our obligations and enforce our rights.

We may have also collected the above categories of B2B Information for the following business and commercial purposes:

- A. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- B. Helping to ensure security and integrity to the extent the use of the consumer's Personal Information is reasonably necessary and proportionate for these purposes.
- C. Debugging to identify and repair errors that impair existing intended functionality.
- D. Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the business, provided that the

consumer's Personal Information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.

- E. Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.
- F. Undertaking internal research for technological development and demonstration.
- G. 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.

III. Sources from Which B2B Information Is Collected.

We collect your B2B Information directly from you through our interactions with you and through your interaction with our online services such as our website. Additionally, we may collect information about you from publicly available sources and from third parties that collect the B2B Information directly from you. We may collect information from our partners such as market research firms and our affiliates, subsidiaries, joint ventures, or other companies under common control. We may combine that information with other information we collect about you.

IV. Third Parties with Whom B2B Information Is Disclosed, Shared, or Sold.

In the preceding 12 months, we have disclosed the following categories of B2B Information for business purposes:

- We disclose B2B Information in categories A (identifiers), B (personal), D (commercial), F (internet), G (geolocation), I (professional), and K (inferences) with service providers.
- We may disclose content posted on our social media platforms (*e.g.*, if you "comment" on a story) publicly on such platforms. Such posts may include B2B Information in categories A and B, but the content depends on the individual posts.
- We may also disclose your B2B Information with our subsidiaries and affiliates in connection with our provision of services or to further our business relationship with you or your company.

In the preceding twelve (12) months, we have not sold B2B Information for monetary consideration. Our use of cookies and other tracking technologies may be considered a sale or share of personal information under California law. Categories of B2B Information that we may have sold or shared under California law include identifiers (*e.g.*, IP addresses), commercial information (*e.g.*, purchase history), and Internet or other similar network activity. Categories of third parties to whom personal information may be sold or shared under California law include data analytics, advertising, and marketing providers.

You can opt out of our use of tracking technologies on our website for analytics and advertising purposes, which may qualify as sales or sharing under the CCPA, by clicking the Do Not Sell or Share My Personal Information link on the homepage of our websites or by broadcasting a Global Privacy Control (“GPC”) signal during your browsing session. Please note that your use of our website may still be tracked by ACA and our service providers for purposes beyond those subject to an exemption.

In the preceding twelve (12) months, ACA has not knowingly sold or shared personal information of California consumers under sixteen (16) years of age.

V. Individual Rights.

If you are a resident of California, you have certain rights regarding our processing of your B2B Information under the CCPA. This section explains these rights and identifies how you may exercise them.

- a) Right to Know About Personal Information Collected, Disclosed, Shared, or Sold. You have the right to request that we disclose the B2B Information we collect, use, and disclose about you to third parties. There are two types of Rights to Know requests that you can make:
 - 1) Right to Know (Abbreviated Request): If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
 - i. Categories of B2B Information collected, sold, or shared;
 - ii. Categories of sources from which B2B Information is collected;
 - iii. Categories of third parties to whom the B2B Information is disclosed; and
 - iv. Business or commercial purpose for collecting, sharing, or selling B2B Information.
 - 2) Right to Know (Specific Pieces of Information Request): If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
 - i. Specific pieces of B2B Information collected about you.

This information will be provided to you free of charge, unless we determine that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period. There are certain exceptions to your Right to Know. We will state in our response if an exception applies.

- b) Right of Deletion. You have the right to request that we and our vendors, service providers and contractors, delete B2B information that we have collected from you by submitting a verifiable request. This right is subject to certain exceptions and does not require us to delete information that we are otherwise required to hold under applicable laws. We will state in our response if an exception applies.

- c) Right to Opt-Out of the Sale or Sharing of Personal Information. You have the right to opt-out of the sale or sharing of your B2B Information subject to certain laws and regulations.

We recognize GPC opt-out preference signals. Your browser must be able to support GPC for us to recognize your opt-out preference signal.

Please note that opt-out choices may be stored via cookies. If you clear cookies, if your browser blocks cookies, or if you view the page from a different browser or device, your opt-out choice may no longer be logged or recognized.

For more information, please visit our Do Not Sell or Share My Personal Information page.

- d) Right to Non-Discrimination or Retaliation. You have the right not to receive discriminatory or retaliatory treatment for exercising the privacy rights conferred by California law. We will not discriminate or retaliate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
- e) Right of Correction. If we maintain inaccurate B2B Information about you, then you have the right to request that we correct the inaccurate B2B Information upon receipt of a verifiable request. Considering the nature of the B2B Information and purposes of processing the B2B Information, you have the right to request that we correct inaccurate B2B Information about you, if applicable. When submitting a request to correct, we request that you submit any information necessary to substantiate your requested correction.
- f) Right to Limit Use and Disclosure of Sensitive Personal Information. You have the right to request that we limit the use and disclosure of your Sensitive Personal Information to only those purposes specifically authorized under California law. At this time, we do not use or disclose your Sensitive Personal Information for purposes that are not specifically authorized under California law. Should this change, we will notify you and provide you with an opportunity to limit our processing of your Sensitive Personal Information.
- g) Submitting Requests. You can submit your request by emailing us at Privacy@ACAcceptance.com or contacting us toll-free at 844-544-3430.
- h) Verifying Requests. To ensure the protection of your B2B Information, we must verify that the individual submitting a request to know, request to delete, or request to correct is the consumer to whom the request relates prior to processing the request. To verify a California resident's identity, we may request up to three pieces of B2B Information (such

as your name, email address, and place of employment) about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury that you are the individual whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us. However, you may be required to access an existing account to the extent accessing the account is necessary.

We will only use B2B Information provided in your request to verify your identity and will delete any information you provide for such verification after processing the request. We reserve the right to take additional steps as necessary to verify the identity of California residents where we have reason to believe a request is fraudulent.

- i) Authorized Agents. You may choose a person or a business that you authorize to act on your behalf to submit your requests (“Authorized Agent”). If you choose to use an Authorized Agent, we require that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with us. Failure to do so may result in us denying your request.

VI. Data Retention.

We retain the information collected pursuant to this Notice for the duration of time required to maintain our business relationship with you and for as long as is required to satisfy the retention requirements of any applicable data retention laws or regulations. B2B Information that is no longer needed for its stated purpose will be destroyed, erased, or made anonymous.

We take appropriate measures to ensure that your B2B Information is processed and disposed of in a manner that maintains its confidentiality. All B2B Information disposal procedures, including the disposal of computerized data storage devices, are designed to ensure the complete destruction of B2B Information and eliminate the risk of subsequent unauthorized access or disclosure.

VII. Changes to this Notice.

We reserve the right to make changes to this Notice from time to time. When we update this Notice, we will post an updated version on this web page. Any changes to this Notice will become effective as of the effective date of the new policy.

This Notice is subject to occasional revision, and if we make any material changes in the categories of information we collect or the reasons we collect that information, we will notify in accordance with applicable law, which may include sending you an e-mail and/or by prominently posting notice of the changes.

VIII. Contact Us.

If you have questions regarding this Notice, please contact us by email at Privacy@ACAacceptance.com or by phone toll-free at 844-544-3430.