

California Personnel Privacy Notice Addendum

Effective Date: December 27, 2023

I. Introduction.

This Privacy Notice Addendum (the “Addendum”) addresses how American Credit Acceptance, LLC (“ACA,” “we,” “us,” or “our”) processes the personal information of ACA personnel—that is, all ACA directors, officers, employees, interns, job applicants, and contractors who are also residents of California (collectively, the “ACA Personnel”; also “you” and “yours”). Throughout our relationship with you, the ACA Personnel, we are required to collect and process certain categories of personal information to facilitate and improve our services, to provide you with benefits, and to ensure the safety and efficiency of our workplaces.

You have rights regarding how we collect and process your personal information under the California Consumer Privacy Act including any amendments and any regulations promulgated thereunder. This Addendum provides a summary of the categories of information we collect, the reasons that we collect each category of information, information regarding how we may disclose personal information with third parties, and information rights under the CCPA. Under the CCPA, “Personal Information” identifies, relates to, describes, or is reasonable capable of being associated or linked to that individual. If you have any questions, please contact us via the Contact Us section, below.

We may not collect all categories of Personal Information about each ACA Personnel. For example, if the collection of Personal Information relates to a specific benefit that is not generally available, we would collect that Personal Information from the ACA Personnel only who are eligible for and enroll in the benefit.

II. Information We Collect.

In the preceding 12 months, we have collected the following categories (as defined by the CCPA) of Personal Information from ACA Personnel:

Categories under 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, Social Security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none">• Administer the employee relationship;• Comply with legal obligations;• Facilitate communications and efficiency;• Provide benefits;• Ensure the safety of employees, contractors, facilities, and property;• Ensure the security of our systems.

Categories under CA Law:	Examples:	Reasons for Collection:
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, 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. Some Personal Information included in this category may overlap with other categories.	<ul style="list-style-type: none"> • Administer the employee relationship; • Comply with legal obligations; • Facilitate communications and efficiency; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property; • Ensure the security of our systems.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> • Administer the employee relationship; • Comply with legal obligations; • Facilitate communications and efficiency; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Facilitate communications and efficiency; • Provide benefits.
E. Biometric information.	None	<ul style="list-style-type: none"> • Administer the employee relationship; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> • Facilitate communications and efficiency; • Provide benefits; • Ensure the security of our systems.
G. Geolocation data.	Physical location or movements.	<ul style="list-style-type: none"> • Facilitate communications and efficiency; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property.
H. Sensory data.	Audio, electronic, visual, or similar information.	<ul style="list-style-type: none"> • Administer the employee relationship; • Comply with legal obligations; • Facilitate communications and efficiency; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property.

Categories under CA Law:	Examples:	Reasons for Collection:
I. Professional or employment-related information.	Current or past job history or performance evaluations.	<ul style="list-style-type: none"> • Administer the employee relationship; • Comply with legal obligations; • Ensure the safety of employees, contractors, facilities, and property.
K. Inferences drawn of the consumer.	Inferences drawn from Personal 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"> • Administer the employee relationship; • Facilitate communications and efficiency; • Provide benefits.
L. Sensitive personal information	<p>Personal information that reveals (a) Social Security number, driver’s license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credential allowing access to an account; (c) precise geolocation; (d) racial or ethnic origin. This may also include citizenship and immigration status.</p> <p>Some Sensitive Personal Information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> • Administer the employee relationship; • Provide benefits; • Ensure the safety of employees, contractors, facilities, and property.

III. Sources of Personal Information.

We collect most of the information that we process about you directly from you, through the applications or forms you submit and the information you provide at the time of hiring. In addition to the information that you provide to us, we may collect information about you from third parties, such as information from third parties that provide accreditation, educational institutions, benefits providers, and vendors that provide background checks or related information. Finally, we may automatically collect, store, or otherwise process information about you as you use our tools, systems, or resources.

IV. How Your Personal Information Is Disclosed.

In the preceding 12 months, we have disclosed the following categories of employment related information with service providers, who are necessary for facilitating the employment relationship and providing you with benefits:

- A (Identifiers), B (Personal), C (Classification), D (Commercial), F (Internet), I (Professional), L (Sensitive).

We enter into written contracts with our service providers to ensure the privacy and security of your Personal Information. Under these contracts, we restrict the access to and processing of your Personal Information to that which is necessary for the purpose of the disclosure.

In certain circumstances, we may provide you with opportunities to sign up for certain benefits programs that involve the disclosure of your Personal Information to third-party benefits providers. Any such program will be purely optional and based on your opt-in participation.

In the preceding 12 months, we have not sold or shared employment-related Personal Information to third parties for money or anything of monetary value.

We do not collect, process, or disclose sensitive personal information, as defined under the CCPA, for purposes other than those specified in Section 7027 of the CCPA regulations, or any employment-related information regarding individuals under 16 years of age. We also do not use your sensitive Personal Information to infer characteristics about you.

V. Individual Rights.

The CCPA provides residents of California with a series of rights regarding the processing of their Personal Information. This section explains the scope of these rights and outlines 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 Personal 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: If you make a Right to Know, you will receive the following information about you:
 - i. Categories of Personal Information collected, disclosed, sold, or shared;
 - ii. Categories of sources from which Personal Information is collected;
 - iii. Categories of third parties to whom the Personal Information is disclosed; and
 - iv. Business or commercial purpose for collecting, disclosing, sharing, or selling Personal 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 Personal 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 a consumer's 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 service providers delete Personal Information that we have collected about 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 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 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.
- d) Right of Correction. If we maintain inaccurate Personal Information about you, then you have the right to request that we correct the inaccurate Personal Information upon receipt of a verifiable request. When submitting a request to correct, we request that you submit any information necessary to substantiate your requested correction. Alternatively, you may correct your own Personal Information by using the HR application on the ACA internal website (e.g., Workday).
- e) 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 process 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.
- f) Submitting Requests. You can submit your request by emailing us at Privacy@ACAacceptance.com or contacting us toll-free at 844-544-3430. We will respond to these requests, if applicable, within 45 days of receipt of the request and without undue delay. If we need to extend this period, we will notify you of the delay and explain the reasonably necessary justifications for our delay. We will provide responses to your requests free of charge unless exclusions apply, which we will identify in our response.
- g) Verifying Requests. To ensure the protection of your Personal 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 consumer's identity, we may request up to three pieces of Personal Information 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 from the consumer 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 Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

- h) 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 Addendum 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. Personal 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 information is processed and disposed of in a manner that maintains its confidentiality. All Personal Information disposal procedures, including the disposal of computerized data storage devices, are designed to ensure the complete destruction of Personal Information and eliminate the risk of subsequent unauthorized access or disclosure.

VII. Changes to this Addendum.

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

This Addendum 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 you by sending you an e-mail and/or by prominently posting notice of the changes.

VIII. Contact Us.

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