

CALIFORNIA PRIVACY NOTICE AT COLLECTION

This PRIVACY NOTICE AT COLLECTION ("Notice") of Credit First National Association ("we," "us," or "our") applies solely to residents of the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice explains how we collect, use, and disclose personal information subject to the CCPA. It also describes the privacy rights of California residents under the CCPA and how they can exercise those rights.

Information We Collect

We collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household ("personal information"). In particular, we may collect the following personal information from you:

| Category | Examples |
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| Identifiers. | Real name, alias, postal address, unique personal or online identifier, Internet Protocol address, email address, account name, social security number, government issued ID, passport number or other similar identifiers. |
| Purpose of Collection/Usage of Identifiers We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; verify your identity; assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; enforce CFNA obligations and rights arising from agreement between CFNA and you; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; evaluate or conduct a merger, divestiture, or restructuring; and protect the rights, property or safety of CFNA or other parties. | |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | Name, signature, social security number, physical characteristics or descriptions, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories. |
| Purpose of Collection/Usage of Personal Information We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; verify your identity; assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; enforce CFNA obligations and rights arising from agreement between CFNA and you; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; evaluate or conduct a merger, divestiture, or restructuring; and protect the rights, property or safety of CFNA or other parties. | |
| Protected classification characteristics under California or federal law. | Age (40 years or older), race, color, religion, national origin, sex, sexual orientation, marital status, physical or mental disability, or income derived from any public assistance program. |
| Usage of Protected Classifications We may use the personal information in this category to: assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |
| Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. |

| Category | Examples |
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| Usage of Commercial Information We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; verify your identity; assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; enforce CFNA obligations and rights arising from agreement between CFNA and you; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |
| Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. |
| Usage of Internet or Network Activity We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |
| Geolocation data. | Physical location or movements. |
| Usage of Geolocation Information We may use the personal information in this category to: deliver, manage, and support products and services; market our products and services; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |
| Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. |
| Usage of Sensory Data We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; assess and manage risk; meet legal, regulatory, or compliance requirements; enforce CFNA obligations and rights arising from agreement between CFNA and you; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |
| Professional/Employment data. | Professional or employment information. |
| Usage of Professional or Employment Data We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; assess and manage risk; market our products and services; testing, research, analysis and product development; and protect the rights, property or safety of CFNA or other parties. | |
| Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |
| Usage of Inferences We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; assess and manage risk; manage fraud and financial crimes; market our products and services; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties. | |

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| Sensitive Personal Information. | Social security number, driver's license or state identification card, passport number, account log-in information, financial account number, debit/credit card account number in combination with any required security or access code, password or credentials to access an account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership. |
| <p style="text-align: center;">Usage of Sensitive Personal Information</p> <p>We may use the personal information in this category to: deliver, manage, and support products and services; manage relationships and maintain accounts; verify your identity; assess and manage risk; manage fraud and financial crimes; meet legal, regulatory, or compliance requirements; market our products and services; enforce CFNA obligations and rights arising from agreement between CFNA and you; improve CFNA website and/or mobile application; testing, research, analysis and product development; respond to law enforcement, regulatory or judicial requests; and protect the rights, property or safety of CFNA or other parties.</p> | |

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Information Collected:

- Identifiers, California Customer Records Statute personal information, and Commercial Information
 - Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website (www.cfna.com)
 - Obtained indirectly from our cardholders or applicants through information we collect in the course of providing services to them
 - Obtained from affiliates or dealers who provide information to us collected from their customers
 - Obtained directly or indirectly from our service providers
- Protected Classification Characteristics under California or Federal law
 - Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website
 - Obtained directly and indirectly from activity on our website (www.cfna.com). For example, from submissions through our website portal or website usage details collected automatically
 - American with Disabilities Act requires websites to be accessible to those with disabilities – the tool enables consumers to set up preferences such as large font, voice recognition, etc.
 - Obtained directly or indirectly from our service providers
- Internet or similar activity
 - Obtained directly and indirectly from activity on our website (www.cfna.com). For example, from submissions through our website portal or website usage details collected automatically
 - Obtained directly or indirectly from our service providers
- Geolocation Information
 - Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website
- Sensory Data

- Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website
- Obtained indirectly from our cardholders or applicants through information we collect in the course of providing services to them
- Obtained directly or indirectly from our service providers
- Inferences and Professional/Employment
 - Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website
 - Obtained indirectly from our cardholders or applicants through information we collect in the course of providing services to them
 - Obtained directly or indirectly from our service providers
- Sensitive Personal Information
 - Obtained directly from our cardholders, applicants, or their authorized agents including the credit application completed at retail locations or on our website
 - Obtained indirectly from our cardholders or applicants through information we collect in the course of providing services to them
 - Obtained directly or indirectly from our service providers

Information Collected:

In the past twelve (12) months, we have collected the categories of personal information listed above relating to California residents. While some of the information that we collect may be considered sensitive personal information, we use and disclose the sensitive personal information for those purposes that are authorized by law. We may process your sensitive personal information in order to perform the service or provide the products you request from us or to verify customer information.

Disclosure of Personal Information to Third Parties:

We may disclose or share personal information to or with a third party for a business or commercial purpose and have done so in the preceding twelve (12) months.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers
- California Customer Records Statute personal information categories
- Protected classification characteristics under California or federal law
- Internet or other similar activity
- Sensory data
- Inferences
- Commercial information
- Sensitive Information

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers
- Our affiliates
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you
- Government agencies as required by state or federal law

Selling or Sharing of Personal Information:

In the preceding twelve (12) months, we have not sold any personal information to a third party.

In the preceding twelve (12) months, we have shared the following categories of personal information to a third party.

- Identifiers

We shared your personal information to the following categories of third parties.

- Data analytics providers
- Data providers and aggregators
- Market research companies

Selling or Sharing of Personal Information of Minors under 16 Years of Age:

We do not knowingly disclose or sell the personal information of minors under 16 years of age.

Retention of Personal Information:

The personal information we collect will be retained for as long as reasonably necessary for the purposes set out in this Notice and consistent with our retention policies, in accordance with applicable laws and applicable industry standards. When determining these retention periods, we consider the length of time personal information is required to be retained to provide the services; satisfy legal and compliance obligations and for audit purposes; address any complaints regarding the services; and defend or bring potential legal claims.

Your Rights and Choices Under the CCPA:

Right to Know:

The CCPA provides consumers who are California residents with specific rights regarding their personal information. You may request that we disclose to you the following information we have collected over the last twelve (12) months:

- The categories of personal information described above that we have collected about you and the categories of sources from which we collected such personal information
- The business or commercial purposes for collecting or sharing such personal information
- The categories of personal information about you that we have disclosed to or shared with third parties for a business purpose and the categories of third parties to whom we have disclosed or shared such personal information
- The specific pieces of personal data we have collected about you

Right to Correct:

California residents also have the right to submit a request to correct inaccurate personal information maintained by us. In many instances, processing those corrections are best made by logging into your online account. 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.

Right to Delete:

California residents also have the right to submit a request to delete their personal information 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.

For your Rights requests, we may decline to honor your request in certain instances. For example, we may decline to honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot

verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer, or where the personal information that we maintain about you is not subject to the CCPA. Nonetheless, you have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

If you are a California resident and would like to exercise your rights to know, correct, or delete, your personal information as described above, please submit your request by using the web form at the following link or call **855.218.6524**.

www.cfna.com


(Select “Privacy and Legal” in the footer, then select “California Consumer Privacy Act – Rights Request – Read More”)

Once we receive your request, we may verify your identity through your account or by requesting additional information sufficient to confirm your identity, such as photos of your government ID.

Do Not Sell or Share My Personal Information or Limit the Use of My Sensitive Personal Information:

The CCPA grants California residents the right to opt out of the sale or sharing of their personal information, including cross-context behavioral advertising (also known as targeted ads), and the right to limit the use and disclosure of their sensitive personal information. Please submit your request by using the web form at the following link or call **855.218.6524**.

www.cfna.com

(Select “ Your California Privacy Choices” in the footer and complete the request form)

Changes to this California Consumer Privacy Act Notice:

We may change or update this CCPA Notice in the future. When we do, we will post the revised CCPA Notice on our website. This CCPA Notice was last updated and became effective on the date posted at the top of this Notice.

For more information, please see our California Privacy Policy located at:

www.cfna.com

(Select “Privacy and Legal” in the footer, then select “California Consumer Privacy Act of 2018 – Read Policy”)