

# UCFS California Privacy Policy

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## CALIFORNIA RESIDENTS

California Consumer Privacy Act

If you are a California resident, this **Privacy Notice for California Residents** supplements the information contained in United Consumer Financial Services Company's [Website Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California including a business ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

### **This Privacy Policy addresses the following topics**

- The Scope of this Privacy Policy
- The Company's Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- How We Will Verify Your Requests
- Requests by Authorized Agents
- The Company's Non-Discrimination Policy
- Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes
- Your "Do Not Track" Browser Setting
- Third-Party Links and Services
- Minors Under 13 Years of Age
- For More Information
- Changes to This California Privacy Policy

The section of this policy entitled, "The Company's Collection, Use and Disclosure of Personal Information", serves as your notice at collection required by California law when we collect personal information about you online

### **The Scope Of This Privacy Policy**

#### What Is Personal Information?

"Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

#### Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information of residents of the State of California in their capacity as consumers ("California Consumers").

#### What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers' (a) visits to our website, (b) calling our

business, and (c) use of our products, applications, or services that references this Privacy Policy (collectively, the “Services”).

#### Whose Personal Information Is Not Covered By This Privacy Policy?

For purposes of this Privacy Policy, “Personal Information” does not include the personal information of California residents who are:

- Company’s employees, job applicants, directors, officers, or independent contractors (collectively, “HR Individuals”), or the emergency contacts of HR Individuals or the dependents or spouses who receive Company benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or
- Employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business.

#### What Else Should I Know About The Company’s Handling Of California Consumers’ Personal Information?

Please read carefully the Company’s [Terms of Use](#) and our [Website Conditions of Use](#), as they contain important information about your use of the Services. If you have any questions, please contact us using the information below.

#### **The Company’s Collection, Use And Disclosure Of Personal Information**

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third-party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our “notice at collection” by informing you of your Personal Information to be collected in the future and the purposes for its use.

#### Categories of Personal Information Collected

In the last 12 months, Company collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.
- **Categories described in Cal. Civ. Code § 1798.80(e)** (except those already listed in “Identifiers” above), including: medical information, photograph, social security number, driver’s license, bank account number, debit card, or any other financial information.
- **Characteristics of protected classifications under California or federal law**, including: age, gender, or marital status.
- **Commercial information**, including: products and services purchased; product registration data; purchase, service, and installation dates.
- **Internet or other electronic network activity information**, including: ...
- **Geolocation data**, including: physical location or movements.
- **Professional or Employment-Related Information**
- **Profile information**, including: attitudes collected from open-ended comments left by users on Company website; purchasing patterns.

Personal information does not include:

- Publicly available information from government records.

- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - 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 Personal Information and Purposes For Using Personal Information

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources and used those categories of Personal Information for the following purposes:

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
Identifiers	Directly from you. For example, from forms you complete or products and services you purchase, either online or by phone.	<ul style="list-style-type: none"> <li>▪ Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>▪ Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>▪ Debugging to identify and repair errors that impair existing intended functionality.</li> <li>▪ Short-term, transient use.</li> <li>▪ Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>▪ Undertaking internal research for technological development and demonstration.</li> <li>▪ Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Company.</li> <li>▪ Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company's products and services.</li> <li>▪ Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>▪ Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>

<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	Directly from you. For example, from forms you complete or products and services you purchase, either online or by phone	The purposes listed for “Identifiers,” except for: Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys. <ul style="list-style-type: none"> <li>▪ Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b>	Directly from you. For example, from forms you complete or products and services you purchase, either online or by phone	The purposes listed for “Identifiers,” except for: Undertaking internal research for technological development and demonstration. <ul style="list-style-type: none"> <li>▪ Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company’s products and services.</li> <li>▪ Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>▪ Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Commercial information</b>	Deidentified or aggregated consumer information	The purposes listed for “Identifiers”.
<b>Internet or other electronic network activity information</b>	Automated technologies in the website, including cookies or through our Third Party Service Providers.	The purposes listed for “Identifiers”.

<p><b>Geolocation data</b></p>	<p>Deidentified or aggregated consumer information</p>	<p>The purposes listed for “Identifiers,” except for:  Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</p> <ul style="list-style-type: none"> <li>▪ Undertaking internal research for technological development and demonstration.</li> <li>▪ Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Company.</li> <li>▪ Product and service training, for example, by providing training and information on using, servicing, selling, and displaying Company’s products and services.</li> <li>▪ Communications about promotions, for example, by communicating about special events, sweepstakes, promotions and surveys.</li> <li>▪ Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback</li> </ul>
<p><b>Professional or employment-related information</b></p>	<p>Directly from you. For example, from forms you complete or products and services you purchase, either online or by phone</p>	<p>The purposes listed for “Identifiers,” except for:  · Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</p> <ul style="list-style-type: none"> <li>▪ Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>▪ Debugging to identify and repair errors that impair existing intended functionality.</li> </ul>
<p><b>Profile information</b></p>	<p>Directly from you. For example, from forms you complete or products and services you purchase, either online or by phone</p>	<p>The purposes listed for “Identifiers”.</p>

### Disclosure of Personal Information To Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose:

<b>Category of Personal Information</b>	<b>Categories of Third Parties</b>
<b>Identifiers</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>
<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>
<b>Characteristics of protected classifications under California or federal law</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>
<b>Commercial Information</b>	Service Providers, including e-commerce vendors.
<b>Internet or Other Electronic Network Activity Information</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website providers</li></ul>
<b>Geolocation Information</b>	<ul style="list-style-type: none"><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>
<b>Professional Or Employment-Related Information</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website provider</li><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>
<b>Profile Information</b>	<ul style="list-style-type: none"><li>▪ Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website provider</li><li>▪ Government agencies, law enforcement, and other parties as required by law, including in litigation</li></ul>

### No Sale of Personal Information

The Company does not and will not sell California Consumers' Personal Information.

### **Your California Privacy Rights**

#### Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Company has collected about them;
- The categories of sources from which Company collected the Personal Information;

- The categories of Personal Information that Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Company's collection, disclosure, or sale of the Personal Information.

#### Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Company has collected from the Consumer.

#### Right to Opt Out of Sale of Personal Information

- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information.

### **How to Exercise Your Rights**

Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- Complete the online request form available here: <http://www.ucfs.net/ccpa>
- Contact by telephone: 888-811-0005
- Contact by email: [privacy@scottfetzer.com](mailto:privacy@scottfetzer.com)

### **Postal Address:**

United Consumer Financial Services Company  
Attn: Compliance Department  
865 Bassett Road, Westlake, Ohio 44145

### **Requests By Authorized Agents**

You may designate an authorized agent to exercise your right to know or your right to delete by submitting to us a completed "Authorized Agent Designation" form. You can obtain the designation form by contacting us at [privacy@scottfetzer.com](mailto:privacy@scottfetzer.com)

If an authorized agent submits a request to know or a request to delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity.

### **How We Will Verify Your Requests**

To prevent anyone other than you, or your authorized agent, from exercising the right to know or the right to delete with respect to your personal information, we follow procedures to verify your, or your agent's, identity. These procedures seek to confirm that the person making a request is the person about whom we have collected personal information or that person's authorized agent. The verification procedures involve matching data points that you provide with your request against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. We will use information you provide in your completed request form to verify your identity, and we may request additional information if necessary to complete the verification process.

### **The Company's Non-Discrimination Policy**

California Consumers have the right not to be subject to discriminatory treatment by Company for exercising their privacy rights under the California Consumer Privacy Act, and Company will not discriminate on that basis. However, Company may charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If Company does so, it will provide Consumers with any legally required notice.

### **Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes:**

Under California law, California Consumers can request information from us whether we have disclosed

Personal Information to any third parties for the third parties' direct marketing purposes. We will not sell your Personal Information to, or share it with, third-party companies for their direct marketing purposes without your consent. California Consumers desiring to request further information about our compliance with these laws or who have questions or concerns about our privacy practices and policies are welcome to contact us using the contact information below.

### **Your 'Do Not Track' Browser Setting**

The Site collects personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information.

### **Third-Party Links And Services**

We provide links to third party websites operated by organizations not affiliated with Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by Company through the Services.

### **Minors Under 16 Years of Age**

We respect the privacy of children. Our Services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

### **For More Information**

For questions or concerns about Company's privacy policies and practices, please contact us at [privacy@scottfetzer.com](mailto:privacy@scottfetzer.com).