

IMPORTANT PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

LAST REVISED: APRIL 28, 2021

This Privacy Notice for California Consumers (“Notice”), provided by Delmarva Funding, dba, Credit Direct (“Credit Direct,” “Company,” “we,” or “our”), supplements, and is expressly made part of, the information contained in Company’s [Online Privacy Policy](#) and applies solely to those who are consumers (“you” or “your”) as defined in Section 1798.140(g) of the California Consumer Privacy Act of 2018 (“CCPA”). We adopt this Notice in compliance with the CCPA and any terms defined in the CCPA have the same meaning when used in this Notice.

Company collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). As a consumer, you have certain rights regarding your personal information as defined in the CCPA. This Notice provides you with information on how Company collects, uses, and shares personal information. It also outlines the rights you have regarding personal information that we collect from you and describes how you can exercise those rights.

Collection and Use of Personal Information

As a company that conducts activities that may be considered financial in nature, Company could be considered “financial institution” as that term is defined in the Gramm-Leach-Bliley Act (“GLBA”). While the CCPA does not exempt financial institutions, and thus, Company, from its requirements, Section 1798.145(e) of the CCPA does exempt personal information collected by a financial institution pursuant to the GLBA. Accordingly, much, if not all, of the data consumers provide to Company, or that we collect from consumers, will fall within the GLBA exemption to the CCPA’s definition of personal information and thus outside the scope of the CCPA.

Company recognizes the eleven (11) broad categories of personal information referenced in the CCPA that a business may collect about a consumer. In particular, Company has collected the following categories of personal information from consumers within the last twelve (12) months (though most, if not all, such personal information is collected pursuant to the GLBA and is thus exempt from the CCPA):

Category	Examples	Collected
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.	YES
B. Personal information categories listed in the California	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,	YES

Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-	Current or past job history or performance evaluations.	NO

related information.		
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include publicly available information from government records, de-identified or aggregated consumer information, or information otherwise excluded from the CCPA’s scope, such as information collected pursuant to the GLBA. Any personal information or category of personal information collected pursuant to the GLBA would not be considered “personal information” under the CCPA.

Notwithstanding the GLBA exemption to which most, if not all personal information collected by Company is subject, we have obtained the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from information we obtain in the course of providing our services to you.
- From third-party business partners such as social media sites, ad networks, and analytics providers.

Company may use this information to:

- Provide you with the information, products, or services you request from us.
- Fulfill the reason you provided the information, such as to respond to customer service requests or other inquiries.
- Create, maintain, customize, and secure your account with us.

- Personalize your website experience and deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent where required by law).
- Help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- Process your requests, purchases, transactions, and payments
- Provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- Prevent transactional fraud.
- Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing notice to you. Such notice may be delivered, for example, by posting an updated California Privacy Notice.

Sharing Personal Information

Company may disclose your personal information to a third party for business purposes. When we do so, Company enters into a contractual arrangement that describes the business purpose and requires the recipient to both: (A) keep that personal information confidential; and (B) not use it for any purpose except performing the obligations under the contract.

We share your personal information with the following categories of third parties for a business purpose:

- Affiliates.
- Service providers.
- Data aggregators.
- Social media companies
- Internet cookie data recipients (e.g., Google analytics)
- Ad networks and advertising partners.

Disclosure of Personal Information for a Business Purpose

The CCPA requires Company to provide you with a statement on its personal information disclosures for a business purpose that reference the eleven (11) categories of information reflected in the chart above. In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.

Sale of Personal Information.

The CCPA similarly requires Company to provide you with a statement on its personal information sales. **The Company does engage in the sale of personal information as defined by the CCPA.** As is common practice among companies that operate online, we have permitted third party advertising networks, social media companies and other third party businesses collect and disclose your personal information (including Internet/Network information, commercial information, and inferences) directly from your browser or device through cookies or tracking technologies when you visit or interact with our websites, use our apps or otherwise engage with us.

Online Advertising.

We participate in interest-based advertising and use third party partners to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. These third parties collect information about your use of our websites over time so that they may play or display ads on our Service, on other websites, apps or services you may use, and on other devices you may use. Typically, though not always, the information collected and used for interest-based advertising is collected through tracking technologies, such as cookies, Flash objects, web beacons, embedded scripts, mobile SDKs, location-identifying technologies, and similar technology. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms.

Most browsers allow you to adjust your browser settings to: (i) notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. We do not currently recognize Do Not Track signals set by your browser. To learn about interest-based advertising and how you may be able to opt-out of some interest-based advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices> and/or the DAA's resources at www.aboutads.info/choices. Please note that these opt-out choices may not affect online advertising that is not cookie-based and you must perform these opt-outs on each browser or device you may use.

Notice Regarding Your Rights

Access & Data Portability Rights

You have the right to request that Company disclose what personal information we collect, use, and disclose. If we receive and confirm your consumer request as verifiable and no exception applies, we will provide you with:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two lists disclosing:
 - Sales, identifying the personal information categories that each category of recipient purchased; and

- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

As previously indicated, Company does not sell the personal information of California consumers.

Deletion Request Rights

Subject to certain exceptions, you have the right to request that we delete any of your personal information that we collected from you and retained. If we receive and confirm your consumer request as verifiable, unless an exception applies we will delete (and direct our service providers to delete) your personal information from our records.

The CCPA provides a number a reasons why a deletion request may be denied. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

To Submit a CCPA Request.

You may submit a request to exercise your California Consumer Rights through one of the mechanisms described below. We will need to verify your identity before processing your request, which may require us to request additional personal information from you. In certain circumstances, we may decline or limit your request, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law.

To exercise your Right to Know, please click [here](#).

To exercise your Right to Request Deletion, please click [here](#).

To exercise your Right to Opt Out of Personal Information Sales, please click the following link: [Do Not Sell My Personal Information](#)

Only you or someone registered with the California Secretary of State and legally authorized to act on your behalf may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

The verifiable consumer request must:

- Provide sufficient information that allows Company to verify, to a reasonable degree of certainty, that you are the person about whom Company collected personal information (or your authorized representative), which may include multi-factor authentication of identifying information provided by you. Such authentication may be conducted and verified independently or in combination with a comparison of personal information already maintained by Company, if any; and
- Describe your request with sufficient detail that allows Company to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us, but we must also be able to confirm the personal information relates to you. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

Company endeavors to respond to a verifiable consumer request within forty-five (45) days of receiving it. If Company requires additional time to process your request, up to a maximum total of ninety (90) days from the date the request is received, we will notify you of this and inform you of the reason for requiring the additional time.

If you have an online account with us, we will deliver our written response to your online account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request or have denied a request, if applicable.

We do not charge 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.

Non-Discrimination

Company will not discriminate against you for exercising any of your CCPA rights as described above. Unless permitted by the CCPA, Company 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 a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Do Not Track Disclosures

How do we respond to Web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites or online services?

We currently do not respond to DNT signals in browsers because we do not track individual users across the web.

May other parties collect personally identifiable information about an individual consumer’s online activities over time and across different websites when they visit www.creditdirect.com?

No.

Other California Privacy Rights

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits certain individuals that are California residents to request information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please email us at ccpainfo-cd@creditdirect.com or write to us at Company.

Changes to Our Privacy Notice

We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on our website and update the Notice’s effective date. **Your**

continued use of our website following the posting of changes constitutes your acceptance of such changes.

Contact Information

Company is committed to responding promptly to any questions or concerns you may have about this Notice. If you have questions concerning the methods by which Company collects or uses your personal information as explained in this Notice and our [Online Privacy Policy](#), the rights granted to you under the CCPA, or how to exercise your rights, or if you are a consumer with a disability and you wish to receive a copy of this Notice, you can contact us by calling, writing, or emailing us:

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Please print and retain a copy of this California Privacy Notice for your records.