

California Privacy Policy

This California Privacy Policy supplements the information contained in the [GM Financial Online Privacy Policy](#), the [Gramm-Leach-Bliley Act \(“GLBA”\) Privacy Notice](#) and the [California Important Privacy Choices for Consumers Notice](#). GM Financial and its subsidiaries (collectively, “GM Financial”) adopt this policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act and its supporting regulations (“CCPA”), and it applies solely to visitors, users and others who reside in the State of California.

For purposes of this policy, “Personal Information” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern, or consumer information that is de-identified or aggregate consumer information. “Sensitive Personal Information” includes any Personal Information that reveals, for example, your social security or driver’s license number, account log-in credentials, precise geolocation, and some types of demographic information, such as your racial or ethnic origin.

Please be aware that GM Financial may be exempt from certain CCPA requirements based on exemptions, including certain Personal Information covered by or collected under industry-specific privacy laws including, but not limited to, the Fair Credit Reporting Act, the GLBA, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

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Collecting Personal Information

GM Financial has collected, maintained, and used the following categories (with examples) of consumer Personal Information in the preceding 12 months:

Categories of Personal Information collected in the preceding 12 months	Categories of sources from which the Personal Information was collected	Business/commercial purpose for which the Personal Information was collected, disclosed, or shared	Categories of service providers and third parties with whom the business shares Personal Information for a business / commercial purpose
Identifiers			
Registration Information for MyAccount • Such as first and last names, account number, e-mail address, and vehicle information such as make, model, and vehicle identification number (“VIN”).	Directly from you	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
Note Opening Information on Rightnotes.com • Such as first and last names, address, date of birth, telephone number, and email address.	Directly from you		Service providers and affiliated entities where applicable to facilitate your note.

Identity Verification Information • Such as information from commercially available third-party sources, such as credit reporting agencies and identity verification services.	Identity verification services; Credit reporting agencies		Service providers and affiliated entities where applicable to facilitate the processing of your credit application.
Social Media Information • Such as first and last names, username, profile picture, user preferences such as “Like” button clicks, and the content of your posts, and other similar identifiers.	Directly from you; Social networks		Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
GM Financial Employment Data • Real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers, etc.	Directly from you	Exhibit A	Service providers and affiliated entities where applicable to facilitate employment.
Account Information			
Account Servicing Information • Such as payment and other transaction history, communication logging and history, correspondence records.	Directly from you; Service providers	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
Characteristics of protected classifications under California or federal law			
Credit Application Information • Information you provide when completing an online credit application or at a dealership, including your date of birth, income information, etc.	Directly from you; Dealerships; Operating systems and platforms; Credit reporting agencies	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
Driver’s License Information • Date of birth, gender/sex, race, photograph, etc.	Directly from you; Dealerships		Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
GM Financial Employment Data • Family Information (marital status, relevant information on spouse/ dependents); Benefit Information (wellness information, COBRA information, healthcare plan information, disability insurance and life insurance information); Disability Claims Records (Workers’ compensation records and disability claims records); Medical Reports or Records (pre-employment drug tests, medical benefits-related documentation); Physical Characteristics (age, disability, race, color, gender); Criminal Background Checks, etc.	Directly from you; Background check vendors; Benefits providers		Service providers and affiliated entities where applicable to facilitate employment.
Commercial Information			
Contract and Related Vehicle Information • Information about the vehicle you purchased or leased including year, make, model, odometer information, and VIN. Retail installment sales contract or lease agreement information you enter into with a dealership or a direct promissory note you enter into with us for a direct vehicle loan.	Directly from you; Dealerships; Operating systems and platforms	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.

<p>Credit Application Information</p> <ul style="list-style-type: none"> Information you provide when completing an online credit application or at a dealership, including your first and last names, physical address, residence type, length of time at current address, monthly rent or mortgage amount, telephone numbers, e-mail address, date of birth, Social security number, employment status, job title, employer name, employer phone number, length of time at place of employment, and income information. 	<p>Directly from you; Dealerships; Operating systems and platforms</p>		<p>Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.</p>
<p>Credit Report Information</p> <ul style="list-style-type: none"> Information provided by credit reporting agencies regarding your credit profile and history. 	<p>Credit reporting agencies</p>		<p>Service providers and affiliated entities where applicable to facilitate the processing of your credit application.</p>
<p>GM Financial Employment Data</p> <ul style="list-style-type: none"> Company Vehicle Programs (Credit Reports and Investigative Credit Reports, which may include driving record, information regarding character, general reputation, personal characteristics, mode of living), etc. 	<p>Credit reporting agencies; Service providers</p>		<p>Service providers and affiliated entities where applicable to facilitate employment.</p>
<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>			
<p>Connected vehicle information</p> <ul style="list-style-type: none"> Vehicle diagnostics, odometer, vehicle use, driving behavior, etc. 	<p>Affiliated entities</p>	<p>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.</p>	<p>Service providers and affiliated entities where applicable to facilitate our servicing of your account.</p>
<p>Recordings</p> <ul style="list-style-type: none"> Call recordings from servicing calls On premises visual recordings Conversations through the messaging feature available on the GM Financial website and mobile app. 	<p>Directly from you; Operating systems and platforms</p>	<p>Refer to Exhibit A</p>	<p>Service providers and affiliated entities where applicable to facilitate our servicing of your account.</p>
<p>GM Financial Employment Data</p> <ul style="list-style-type: none"> Visual and audio information (video interviews, security cameras), etc. 	<p>Directly from you</p>		<p>Service providers and affiliated entities where applicable to facilitate employment.</p>
<p>Internet or other electronic network activity information</p>			
<p>Online Information</p> <ul style="list-style-type: none"> Such as device ID, device and platform type, operating system, IP address, browser type and version, domain name, and referring website/service/application. 	<p>The device or computer you use to access the site</p>	<p>Refer to Exhibit A</p>	<p>Service providers and affiliated entities where applicable to facilitate our servicing of your account.</p>
<p>GM Financial Employment Data</p> <ul style="list-style-type: none"> Job Related Information (web tracking, sites visited), etc. 	<p>The device or computer you use to access the site</p>		<p>Service providers and affiliated entities where applicable to facilitate employment.</p>
<p>Professional or employment-related information.</p>			

Credit Application Information • Such as first and last names, physical address, residence type, length of time at current address, monthly rent or mortgage amount, home, mobile and business telephone numbers, e-mail address, date of birth, SSN, employment status, job title, employer name, employer phone number, length of time at place of employment, and income information.	Directly from you; Dealerships; Operating systems and platforms	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
GM Financial Employment Data • Employment history, employment verification, promotions, service dates, training information, length of service, compensation, tax information, bank account data, current department/ position, employment status, job performance, disciplinary documents, recordings of customer servicing calls, relocation information, employee development information, Payroll information, etc.	Directly from you; Service providers; Former Employers		Service providers and affiliated entities where applicable to facilitate employment.
Education Information			
Details of your education, degree, level of education, etc.	Directly from you; Dealerships	Refer to Exhibit A	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
GM Financial Employment Data • Education reimbursement information, resume and application information, education verification, etc.	Directly from you; Service providers; Educational Institutions		Service providers and affiliated entities where applicable to facilitate employment.
Inferences			
Social Media Information • Information that you send directly to GM Financial or post to any of GM Financial's social media websites for publication on the Internet, such as your first and last names, user name, profile picture, user preferences such as "Like" button clicks, and the content of your posts.	Directly from you; Social networks	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
GM Financial Employment Data • Job Related Information (job performance, disciplinary documents, employee development information); Education Information, etc.	Directly from you; GM Financial Management		Service providers and affiliated entities where applicable to facilitate employment.
Categories of personal information described in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))			
Identifiers • Identifiers as noted in above examples including name, SSN, address, telephone number, Driver's License or state identification card number.	See Identifiers above	See Identifiers above	See Identifiers above.
Commercial Information • Commercial Information as noted in the above examples including signature, insurance policy number, education, employment, and employment history.	See Commercial Information above	See Commercial Information above	See Commercial Information above.

Bank Account/Financial Information • Bank account number and other financial information provided when you make payments to us.	Directly from you	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
GM Financial Employment Data • Identifiers, Commercial Information, Professional or employment-related information, Education Information, Medical information, Health insurance information, Payroll information (bank account number), Insurance policy numbers, etc.	Directly from you; Educational Institutions, Benefits providers; Former Employers; Service providers		Service providers and affiliated entities where applicable to facilitate employment.
Sensitive Personal Information			
• Social security number, Tax Identification Number, Driver’s License number, passport number, or other similar identifiers	Directly from you; Dealerships; Credit reporting agencies; Identity verification services	Refer to Exhibit A	Service providers and affiliated entities where applicable to facilitate our servicing of your account; Service providers and affiliated entities where applicable to facilitate employment.
• Precise geolocation data, including vehicle location data for certain collection, recovery and servicing purposes.	Affiliated entities	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.	Service providers and affiliated entities where applicable to facilitate our servicing of your account.

GM Financial retains your Personal Information for as long as we believe is necessary or appropriate to achieve the business and commercial purposes that we’ve notified you of, as set forth above or to comply with applicable law, audit requirements, regulatory requests, or orders from competent courts.

Disclosure, Sale, or Sharing of Personal Information

GM Financial has disclosed for a business or commercial purpose in the preceding 12 months the categories of Personal Information to third parties or service providers described above.

The CCPA provides consumers with the right to opt out of the sale or sharing of Personal Information by a business. Under California law, “share” means disclosing your Personal Information by us to a third party for cross-context behavioral advertising, in exchange for money or anything else of value. We may share your Personal Information with service providers and third parties for cross-contextual behavior advertising. In the preceding 12 months, we have shared the following categories of consumer Personal Information for cross-contextual behavioral advertising to service providers and the following categories of third parties.

- **Identifiers** to social media companies and data analytics firms.
- **Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))** to social media companies and data analytics firms.
- **Internet or other similar network activity** to social media companies and data analytics firms.
- **Inferences drawn from other personal information** to social media companies and data analytics firms.

We may share your personal information for the following purposes:

- **Advertising and Marketing Services:** We share Personal Information to provide advertising or marketing services on our own behalf.
- **Commercial/Economic Interests:** We share Personal Information to advance our commercial or economic interest.

In the preceding 12 months, we have not sold any Personal Information. In addition, we do not sell Personal Information. Also, it is our business practice not to sell Personal Information of minors under 16 years of age and we have no actual knowledge of doing so.

We also have not used or disclosed Sensitive Personal Information outside of the exceptions allowed for in the CCPA and its implementing regulations.

California Privacy Rights

If you are a California consumer, under the CCPA, you have the right, subject to exceptions, to request that we:

- Provide you with information on the categories of Personal Information we collect and the length of time we retain such information before or at the time we collect Personal Information.
- Delete Personal Information about you which we have collected or maintained.
- Disclose the following, with respect to Personal Information we have collected or shared in the 12 months preceding your request:
 - The categories of Personal Information we have collected about you;
 - The categories of sources from which the Personal Information was collected;
 - The business or commercial purpose for which we collected, sold, or shared the Personal Information;
 - The categories of third parties to whom we disclose the Personal Information to;
 - The specific pieces of Personal Information collected about you;
- Correct inaccurate Personal Information that we maintain about you.
- Opt-out of the sale or sharing of your Personal Information. We do not collect or sell the Personal Information of minors under 16 years of age without affirmative authorization.
- Limit the use or disclosure of Sensitive Personal Information we maintain about you. We do not use or disclose any Sensitive Personal Information other than as allowed by the CCPA and its implementing regulations.

Authorized Agents

You may designate an authorized agent (a natural person or a business entity) to make a request on your behalf. The designated agent may be required to provide us your written authorization to act on your behalf, or other legal documentation to prove the individual is acting on your behalf. We may also: 1) confirm your identity by verifying certain identifying information, and 2) confirm directly with you that you provided the authorized agent permission to submit the request.

Non-Discrimination and Non-Retaliation

We will not discriminate or retaliate against you because you exercise any of your rights as described in this section, including but not limited to, by: 1) denying you goods or services; 2) charging you different prices or rates for goods or services; 3) providing a different level or quality of goods or services to you; or 4) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights

To exercise any right described in this policy, please submit a request at www.gmfinancial.com/californiaprivacy or contact us toll free at 866-537-8843.

We will request certain pieces of information about you to verify your identity including first and last name, last four digits of Social Security number, date of birth, address, and e-mail address if you are a customer, have applied for credit, or are a personal guarantor. For some request types, less information will be required to verify, and will depend upon the type of information requested.

GM Financial will disclose (where required to do so) and deliver the required information free of charge, or correct inaccurate Personal Information, or delete a consumer's Personal Information based on the consumer's request, within 45 days of receiving a verifiable consumer request from the consumer. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary, and we will notify you if such an extension is necessary.

GM Financial processes Global Privacy Control preference signals. GM Financial applies the Global Privacy Control signal at the browser level.

For questions or concerns about our privacy policies, notices and practices or if you would like a copy of this policy mailed, e-mailed or faxed to you, or if you would like to access this policy in an alternative format, please contact us at 866-537-8843. For Further

Information on GM Financial's privacy policy and privacy practices you can view the Online Privacy Policy at <https://www.gmfinancial.com/en-us/privacy-and-security/privacy-policy-online.html>.

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Exhibit A

Business/commercial purpose for which the information was collected, disclosed, or used

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.

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.

Helping to ensure security and integrity to the extent the use of customer's Personal Information is reasonably necessary and proportionate.

Debugging to identify and repair errors that impair existing intended functionality.

Short-term, transient use, including but not limited to non-personalized advertising shown as part of the consumer's interaction with GM Financial, provided that the Personal Information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter the consumer's experience outside the current interaction.

Undertaking internal research for technological development and demonstration.

Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer, provided that for the purpose of advertising and marketing, a service provider or contractor shall not combine the Personal Information of opted-out consumers which the service provider or contractor receives from or on behalf of GM Financial with Personal Information which the service provider or contractor receives from or on behalf of another person or persons, or collects from its own interactions with consumers.

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.

Comply with federal, state, or local laws.

Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.

Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law.

Other legal obligations, including but not limited to exercising or defending legal claims.

In a merger, acquisition, bankruptcy or other transaction where a third party assumes control of us.