



## CCPA Disclosure for California Residents

The following disclosure is for California residents (“Consumer”) on behalf of the Ally Financial Inc. group of companies (“Ally”). The terms “we,” “our,” and “us” in this policy (“Policy”) refer to Ally and its family of companies.

### Overview

Ally is committed to your privacy. This disclosure supplements the information contained in our online and consumer privacy notices and provides Consumers more information about our Information Practices. The Policy covers information subject to the California Consumer Privacy Act and its implementing regulations (“CCPA”) that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household (“Personal Information”) that is collected, used, or disclosed outside of or separate from exempted activities covered under federal law, such as when we collect personally identifiable information to offer you a financial product or service for personal, family, or household purposes. We may separately provide CCPA Disclosures or Notices prior to collection of certain Personal Information as described in those notices.

### Collection, Use, and Disclosure of Personal Information

#### Categories of Personal Information

We collect, have collected, used, and disclosed, in the past twelve months, the following categories of Personal Information:

- Identifiers such as full name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, telephone number, account title, Social Security number, driver's license number, passport number, or other similar identifiers;
- Personal Information as defined in the California information safeguards law such as driver's license or state identification card number, bank account number, debit card number, or any other financial information;
- Protected classification characteristics under California or federal law such as age, citizenship, physical or mental disability, veteran, or military status;
- Commercial information such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity or information such as browsing history, search history, information on a Consumer's interaction with a website, application, or advertisement;
- Geolocation data;
- Sensory data such as audio, electronic, or similar information;
- Professional or employment-related information; and
- Inferences drawn from other Personal Information reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

#### Purposes for Collection and Disclosure of Personal Information

We collect, have collected, and disclosed in the past twelve months the above categories of Personal Information for one or more of the following Business, Commercial or other purposes:

- To fulfill or meet the reason for which the information was provided;
- To provide, support, and develop our websites, products, and services;
- To create, maintain, customize, and secure your account with us;
- To process your requests, purchases, transactions, and payments and prevent transactional fraud and financial crimes;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our response;



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- To personalize your website experience and to deliver relevant content and product and service offerings, including targeted offers and ads through our digital properties, and via email or text message (with your consent, where required by law);
- To help maintain the safety, security, and integrity of our business websites, products and services, databases, and other technology assets;
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services;
- To respond to law enforcement requests and as required by applicable law, court order, governmental regulations, or to align with supervisory expectations;
- For auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with the CCPA and other standards; or
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

## **Collection, Use, and Disclosure of Sensitive Personal Information**

### **Categories of Sensitive Personal Information**

We collect, have collected, used, and disclosed, in the past twelve months, the following categories of Personal Information (“Sensitive Personal Information”) that reveals:

- A Consumer’s Social Security number, driver’s license, state identification card, or passport number;
- A Consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; and
- The contents of a Consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.

### **Purposes for Collection of Sensitive Personal Information**

We collect and have collected in the past twelve months the above categories of Sensitive Personal Information for one or more of the following purposes consistent with the CCPA:

- To provide services you requested that were described to you when the information was collected;
- To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions;
- To ensure your physical safety;
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us;
- To perform services, such as 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; or
- To verify or maintain the quality of a service and to improve, upgrade, or enhance the services we provide.

### **Sources of Personal and Sensitive Personal Information**

We collect and have collected the above categories of Personal and Sensitive Personal Information from the following sources:

- From Consumers or authorized agents and parties (e.g., from documents that you provide to us related to the services for which you engage us);
- Directly and indirectly from your activity on our digital properties;



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- Information from commercial or corporate customers about individuals associated with such customers (e.g., employee, owner, key management personnel, managing partner, or board member);
- From public record sources (Federal, State or Local Government Sources);
- From third parties (e.g., credit bureaus and consumer data resellers) that interact with us in connection with services and activities we perform; or
- From our affiliates.

We will not collect additional categories of Personal or Sensitive Personal Information or use Personal Information we collect for purposes not described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

### **Disclosure of Personal Information**

We disclose and have disclosed the above categories of your Personal or Sensitive Personal Information to third parties for Business Purposes or as required or permitted by law including with:

- Our affiliates and subsidiaries;
- Service providers or contractors;
- Third parties to whom you authorize us, directly or indirectly, to disclose your personal information in connection with products or services we provide to you; or
- Government or regulatory authorities, as required by law.

### **Retention of Personal Information**

The criteria we use to determine how long we retain the above categories of Personal or Sensitive Personal Information take into account Ally's legal or regulatory obligations to maintain the information and business needs to enable solely internal uses.

### **Sale of Personal Information**

In the preceding twelve months, we have not sold to a third party for monetary or other valuable consideration any Personal Information subject to the CCPA.

### **Information for Parents or Guardians**

We do not knowingly sell or share Personal Information about children under the age of 16. We may collect Personal Information about children under the age of 16 when that information is provided by a parent, legal guardian, or authorized adult.

### **Your Rights Under the CCPA**

As a California resident, you have the right to request that we disclose certain information about our collection and use of your Personal or Sensitive Personal Information over the past twelve months including:

- The categories of Personal or Sensitive Personal Information we have collected about you;
- The categories of sources from which we have collected Personal or Sensitive Personal Information about you;
- The purpose for collecting that Personal or Sensitive Personal Information;
- The Business Purpose for disclosing that Personal or Sensitive Personal Information to service providers or contractors;
- The categories of service providers or contractors to whom we have disclosed that Personal or Sensitive Personal Information;
- The categories of Personal or Sensitive Personal Information to whom we have disclosed with a service provider or contractor for a Business Purpose; and
- The specific pieces of Personal or Sensitive Personal Information we have collected about you.

### **Right to Request Deletion of Personal Information**

California law gives you the right to request deletion of your Personal Information. We limit the Personal



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Information that we collect from you and only collect Personal Information from you for Business or Commercial purposes. We may deny your request for deletion of Personal or Sensitive Personal Information if it is reasonably necessary for us or our service providers to retain the information pursuant to the CCPA.

### **Right to Limit the Use of Sensitive Personal Information**

We limit the Sensitive Personal Information that we collect from you and only collect Sensitive Personal Information from you for the purposes stated above and do not create any inferences about you from such Sensitive Personal Information.

### **Right to Correct Inaccurate Information**

The CCPA gives you the right to request the correction of inaccurate Personal Information.

### **Non-Discrimination Rights**

You have the right to not receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA.

### **Exercising Your Rights**

If you are a California resident, you can submit a request to us by:

- **Emailing us:** [dataprivacyrequests@ally.com](mailto:dataprivacyrequests@ally.com)
- **Calling us:** 1.888.925.2559 (Ally Auto); 1.877.247.2559 (Ally Bank); 1.866.677.8630 (Ally Direct Auto); 1.800.684.8823 (Demand Notes); 1.855.256.2559 (Ally Home); 1.800.631.5590 (Ally Insurance); 1.855.880.2559 (Ally Invest); 1.800.427.9184 (Ally Lending); 1.844.341.6800 (PLUS Finance); 1.888.366.2559 (Ally Credit Card)

You, or a person whom you authorize on your behalf may only make a verifiable consumer request related to your Personal Information twice within a twelve-month period.

For a verifiable consumer request, you must be able to:

- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond; and
- Provide sufficient information to allow us to reasonably verify you are the California resident about whom we collected Personal Information or an authorized representative of such resident. The information you provide must include:
  - Confirmation of California residency;
  - Full name;
  - Address; and
  - Email address.
- For requests made by an authorized representative, we may require proof of authorization and verification of identity directly from the person for whom the request is made.

If we have difficulty verifying your identity, we may request additional information necessary to authenticate you, such as a phone number or a list of current products or services you may have with Ally. We will only use the personally identifiable information you provide to make a request to verify your identity or identity of the individual on whose behalf you are making the request.

For requests to correct, we will make an effort to verify the Consumer based on personal information that is not the subject of the request to correct.

We cannot respond to your request or provide you with information you have requested if we cannot verify your identity. Submitting a verifiable consumer request does not require you to create an account



with us.

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### Response Time and Method

We will work to process verifiable consumer requests within 45 days of receipt pursuant to the CCPA. If we need additional time for up to an additional 45 days in order to process your verifiable request, we will provide you with an explanation for the delay.

We will deliver our written response by mail or electronically (provided we can do so securely) at your direction. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Further, we will not provide Personal or Sensitive Personal Information, such as a Social Security number or any other specific pieces of Personal Information, if the disclosure could result in unauthorized access, cause fraud or other security risks.

### Questions or Comments

If you have questions or comments regarding this CCPA disclosure or Ally's privacy practices, please contact us by:

Email	Online	Phone
<a href="mailto:dataprivacyrequests@ally.com">dataprivacyrequests@ally.com</a>	<a href="https://www.ally.com/privacy">https://www.ally.com/privacy</a> , via the "Contact" menu on the top of the page	1.888.925.2559 (Ally Auto) 1.877.247.2559 (Ally Bank) 1.888.366.2559 (Ally Credit Card) 1.800.684.8823 (Demand Notes) 1.866.677.8630 (Ally Direct Auto) 1.855.256.2559 (Ally Home) 1.800.631.5590 (Ally Insurance) 1.855.880.2559 (Ally Invest) 1.800.427.9184 (Ally Lending) 1.844.341.6800 (PLUS Finance) 1.855.283.2559 (Ally powered by Better) 1.866.401.4742 (Ally Home servicing)