



## CCPA Disclosure for California Residents for Employees and Prospective Employees (California Residents Only)

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 notice 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. 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 and Sensitive Personal Information

#### Categories of Personal Information

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

- 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;
- Biometric information, such as fingerprints and voiceprints;
- Sensory data such as audio, electronic, visual or similar information such as call and video recordings;
- Professional or employment-related information; and
- Education information.

## Categories of Sensitive Personal Information

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

- 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;
- A Consumer's racial or ethnic origin;
- A Consumer's citizenship status;
- A Consumer's immigration status; and
- The contents of a Consumer's mail, email, and messages.

## 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 California residents or authorized agents and parties (e.g., through information we collect from you including your employer or when you apply to work at Ally or become an employee);
- Directly and indirectly from your activity on our digital properties (e.g., from submissions through our website portal or website details we collect automatically);
- 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.

## Purposes for Collection and Disclosure of Personal Information

We collect, have collected, and disclosed in the past twelve months the

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above categories of Personal Information for one or more of the following purposes, consistent with the CCPA:

- To fulfill or meet the reason for which the information was provided;
- To help maintain the safety, security, and integrity of our business websites, products and services, databases and other technology assets;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To comply with state and federal law requiring employers to collect and maintain certain records;
- To ensure your physical safety;
- To manage the recruitment process and perform background checks;
- To process and evaluate your application for employment;
- To effectively process payroll;
- To administer and maintain group health insurance benefits, 401K or retirement plans, stock purchase plans;
- To manage employee performance of their job duties;
- To verify or maintain the quality of a service and to improve, upgrade, or enhance the services we provide; or
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

## 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, including, but not limited to, managing the recruitment process, performing background checks, processing and evaluating your application for employment;
- To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted sensitive personal information;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at Ally 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 ongoing 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, processing payroll, 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.

## Disclosure of Personal and Sensitive 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.

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

## Retention of Personal and Sensitive Personal Information

The criteria we use to determine how 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.



## 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 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 Information that we collect from you and only collect Personal Information from you for business or 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)
- **Submit your request through our** [\*\*California Consumer Privacy Act Request Form\*\*](#)

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;
    - 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 personal information if we cannot verify your identity. Submitting a verifiable consumer request does not require you to create an account with us.



## 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. 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 additional information, please read our privacy policy, which is located at <https://www.ally.com/content/dam/pdf/corporate/ally-careers-privacy-policy.pdf>

## Changes to This Notice

We reserve the right to alter this Notice at any time. Any change to this Notice will be posted on our websites in a timely manner.

This Notice was last updated on 3/31/2025