

# 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 and its 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.

Exceptions for GM Financial’s requirements under CCPA include: 1) 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; 2) Personal Information collected about a job applicant, employee, and contractor, or the emergency contact information of such persons, to the extent the information is collected and used solely within the context of the person acting as a job applicant, contractor, or an employee of GM Financial; and 3) Personal Information of a consumer who is a natural person acting as an employee, owner, director, officer, or contractor of a company or other business entity in the sole context of the business conducting due diligence regarding, or providing or receiving a product or service to or from us.

## Table of Contents

[Collecting Personal Information](#)

[Disclosure or Sale of Personal Information](#)

[California Privacy Rights](#)

[Authorized Agents](#)

[Non-Discrimination](#)

[How to Exercise Your Rights](#)

[Other Privacy Notices](#)

## Collecting Personal Information

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

- **Identifiers**
  - **Registration Information for My Account:** Information you provide to us when you register on MyAccount, including your first and last names, GM Financial account number, Social Security number, e-mail address, and vehicle information such as make, model, and vehicle identification number (“VIN”).
  - **Note Opening Information on Rightnotes.com:** Information you provide to us when you open a note on RightNotes.com including your first and last names, Social Security number or Tax Identification Number, Driver’s License number, address, date of birth, telephone number, and e-mail address.
  - **Identity Verification Information:** Information from commercially available third-party sources, such as consumer reporting agencies and identity verification services.
  - **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.
- **Account Information**
  - Information GM Financial collects servicing your account including, but not limited to, payment and other transaction history, communication logging and history, correspondence records, etc.
- **Characteristics of protected classifications under California or federal law**
  - **Credit Application Information:** Information you provide when completing an online GM Financial credit application or at a dealership, including your date of birth, income information, etc.

- **Driver's License Information:** Date of birth, gender/sex, race, photograph, etc.
- **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.
  - **Credit Application Information:** Information you provide when completing an online GM Financial 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, home, mobile and business 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.
  - **Credit Report Information:** Information provided by credit reporting agencies regarding your credit profile and history.
- **Audio, electronic, visual, thermal, olfactory, or similar information**
  - Vehicle diagnostics, odometer, vehicle use, driving behavior, etc.
- **Geolocation data**
  - Vehicle location data for certain collection, recovery and servicing purposes.
- **Internet or other electronic network activity information**
  - **Online Information:** Information about the device or computer you use to access the Site, including device ID, device and platform type, operating system, IP address, browser type and version, domain name, and referring website/service/application.
- **Professional or employment-related information**
  - **Credit Application Information:** Information you provide when completing an online GM Financial 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, home, mobile and business 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.
- **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.
- **Categories of personal information described in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))**
  - Identifiers as noted in above examples including name, Social Security number, address, telephone number, Driver's License or state identification card number.
  - Commercial Information as noted in the above examples including signature, insurance policy number, education, employment, and employment history.
  - Bank account number and other financial information provided when you make payments to us.

Categories of Personal Information Collected in the preceding 12 months (described in above bullets)	Categories of sources from which the information was collected	Business/Commercial purpose for which the information was collected	Categories of third parties/service providers with whom the business shares for a business/commercial purpose (There has been no sale of California Personal Information to a third party in the preceding 12 months).
<b>Identifiers</b>			
Registration Information for My Account	Directly from you	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
Note Opening Information on Rightnotes.com	Directly from you	Undertaking internal research for technological development and demonstration.	Service providers and affiliated entities where applicable to facilitate your note.
Identity Verification Information	Identity Verification Services, Consumer Reporting Agencies	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.	Service providers and affiliated entities where applicable to facilitate the processing of your credit application.
Social Media Information	Directly from you		Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
<b>Account Information</b>			
Account servicing information	Directly from you; from service providers	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account.

<b>Characteristics of protected classifications under California or federal law</b>			
Credit application information	Directly from you or from dealerships	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
Driver's License Information	Directly from you or from dealerships	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
<b>Commercial Information</b>			
Contract and related vehicle information	Directly from you or from dealerships.	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
Credit Application Information	Directly from you or from dealerships	<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p>	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.
Credit Report Information	Credit Reporting Agencies	<p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p>	Service providers and affiliated entities where applicable to facilitate the processing of your credit application.

		<p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	
<b>Audio, electronic, visual, thermal, olfactory, or similar information</b>			
Connected vehicle information	Affiliated entities	Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Geolocation data</b>			
Vehicle location data	Affiliated entities	Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Internet or other electronic network activity information</b>			
Online Information	The device or computer you use to access the site	<p>Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Short-term, transient use, 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 an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
<b>Professional or employment-related information.</b>			
Credit Application Information	Directly from you or from dealerships	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer</p>	Dealerships, affiliated entities, and service providers to facilitate the processing and servicing of your account.

		<p>service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	
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**Inferences**

Social Media Information	Directly from you	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account or responding to your requests.
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**Categories of personal information described in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))**

Identifiers	See above	See above	See above
Commercial Information	See above	See above	See above

Bank Account/Financial Information	Directly from you	<p>Auditing related to a current interaction with the consumer and concurrent transactions and auditing compliance.</p> <p>Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</p> <p>Debugging to identify and repair errors that impair existing intended functionality.</p> <p>Undertaking internal research for technological development and demonstration.</p> <p>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.</p>	Service providers and affiliated entities where applicable to facilitate our servicing of your account.
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### **Disclosure or Sale of Personal Information**

The CCPA provides consumers with the right to opt out of the sale of Personal Information by a business. However, we do not and will not sell California consumers' Personal Information. In addition, in the preceding twelve (12) months, we have not sold any California Personal Information. GM Financial has disclosed for a business or commercial purpose in the preceding 12 months the following categories of Personal Information to third parties or service providers: identifiers, characteristics of protected classifications under California or federal law, commercial information, audio/electronic/visual/thermal/olfactory/similar information, geolocation data, internet or other electronic network activity information, professional or employment-related information, inferences, and categories of personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)). We do not collect or sell the Personal Information of minors under 16 years of age without affirmative authorization.

### **California Privacy Rights**

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

- Delete Personal Information about you which we have collected or maintained.
  - Reasons GM Financial may deny your request include, but are not limited to: 1) our need to retain the information to complete the transaction for which your Personal Information was collected; 2) to enable solely internal uses reasonably aligned with consumer expectations; and 3) to comply with legal obligations. You will be asked to confirm your desire for deletion on our website through a two-step process. You must first submit your request for deletion and then second, separately confirm you would like your Personal Information deleted.
- 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 that we have collected about you.
  - The categories of sources from which the Personal Information is collected.
  - The business or commercial purpose for collecting your Personal Information.
  - The business or commercial purpose for disclosing the category of Personal Information about you.
  - The specific pieces of Personal Information we have about you.
    - GM Financial will not provide specific pieces of Personal Information if the disclosure creates a substantial, articulable and unreasonable risk to the security of the Personal Information, the consumer's account, or the security of GM Financial's systems or networks.
    - GM Financial will not disclose a consumer's Social Security number, Driver's License number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers.

- If we disclosed your Personal Information for a business or commercial purpose:
  - The categories of Personal Information that we disclosed about you for a business or commercial purpose; and
  - The categories of third parties to whom your Personal Information was disclosed for a business or commercial purpose, and which category of Personal Information was disclosed to that category of third party.

### **Authorized Agents**

You may designate an authorized agent (a natural person or a business entity registered with the Secretary of State) to make a request on your behalf. The designated agent will 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 must also be able to confirm your identity by verifying certain identifying information.

### **Non-Discrimination**

We will not discriminate 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](http://www.gmfinancial.com/californiaprivacy) or contact us toll free at 866-537-8843.

We will request certain pieces of information about you in order to verify your identity including first and last name, last four digits of Social Security number, address, e-mail address or phone number, and date of birth 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. For requests pertaining to household Personal Information for specific pieces of information or for deletion, all members of the household must be verified.

GM Financial will disclose (where required to do so) and deliver the required information free of charge 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.

You may only make a verifiable consumer request for personal information twice in a 12 month period.

### **Other Privacy Notices**

Also linked on our site are the following privacy notices and policies that apply to you:

- Our Online Privacy Policy which explains what information GM Financial may collect about you when you use the GM Financial website and the GM Financial Right Notes website, or mobile applications.
- Our GLBA Privacy Notice which details how we share your personal information and gives you the right to limit some, but not all, sharing.
- Our California specific Privacy Notice entitled "Important Privacy Choices for Consumers" which allows you to further restrict certain information sharing pursuant to the California Financial Information Privacy Act.

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, please contact us at 866-537-8843.

**Last Revised: December 23, 2019**