



CCPA Disclosure for California Residents

Effective: January 1, 2020

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

Overview

Ally is providing this disclosure in order to comply with the California Consumer Privacy Act (CCPA). The CCPA is a law that provides additional data privacy rights to California residents with regards to the collection, use, and deletion of their personal information. “Personal Information” is information 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 device.

Ally is committed to consumer privacy. This disclosure supplements the information contained in our online and consumer privacy notices and provides California residents more information about Personal Information we collect and disclose for a business purpose. The Policy covers Personal Information, as defined under CCPA, that is collected, used, or disclosed outside of or separate from already exempted activities covered under federal law, such as when we collect Personal Information to offer you a financial product or service for personal, family, or household purposes.

Collection, Use, and Disclosure of Personal Information

We collect and have collected, used, and disclosed, in the past 12 months, the following categories of Personal Information about California residents:

- 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 listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) such as full name, signature, Social Security number, address, telephone number, passport number, 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 (40 years or older), 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 such as physical location or movements;
- Sensory data such as audio, electronic, or similar information;
- Professional or employment-related information; and
- Inferences drawn from other personal information which may include Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We collect the above categories of Personal Information from the following sources:

- From California residents or authorized agents and parties (e.g., from documents that you provide to us related to the services for which you engage us or through information we collect from you including your employer, in the course of providing services to you);
- 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 that interact with us in connection with the services we perform (e.g., from credit bureaus); and



- From our affiliates.

We collect and have collected in the past 12 months the above categories of Personal Information for one or more of the following business purposes:

- To fulfill or meet the reason for which the information was provided. If you provide your personal information to purchase a product or service, we will use that information to process your request;
- To provide, support, personalize, 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;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our response;
- To personalize your website experience and to deliver relevant content and product and service offerings, including targeted offers and ads through our websites, third-party sites, 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, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA; and

We will not collect additional categories of Personal Information or use Personal Information we collect for purposes not disclosed within this Policy.

Disclosure of Personal Information

We disclose the above categories of your Personal Information to third parties for business purposes. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except what is explicitly stated in the contract.

We may also share the above categories of Personal Information with third parties for business purposes or as required or permitted by law including with:

- Our affiliates and subsidiaries;
- Service providers;
- 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; and
- Government or regulatory authorities, as required by law.

Sale of Personal Information

In the preceding 12 months, we have not sold, or otherwise disclosed to third party for monetary or other valuable consideration, any Personal Information subject to the CCPA.

Information for Parents or Guardians

We do not knowingly collect or maintain information about children under the age of 16, unless 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 information over the past twelve months including:



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- The categories of Personal Information we collected about you;
- The categories of sources from which we collected Personal Information about you;
- The business purpose for collecting that Personal Information;
- The business purpose for disclosing that Personal Information to third parties;
- The categories of third parties with whom we have shared or share that Personal Information;
- The categories of Personal Information we disclosed or shared with a third party for a business purpose; and
- The specific pieces of Personal Information we 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 purposes. Ally is providing the following methods to request deletion to comply with the CCPA. However, please keep in mind that Ally is not legally required to honor your request for deletion if the Personal Information is needed for a business purpose.

Non-Discrimination Rights

You have the right to not receive discriminatory treatment for the exercise of the 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
- **Calling us:** 1.888.925.2559 (Ally Auto); 1.877.247.2559 (Ally Bank); 1.855.256.2559 (Ally Home); 1.855.880.2559 (Ally Invest); 1.800.427.9184 (Ally Lending); 1.800.684.8823 (Demand Notes); 1.866.677.8630 (Clearlane)

Only you, or a person registered with the California Secretary of State whom you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request twice within a 12-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; and
 - Other information that authenticates you (if a customer) or verifies you (if non-customer or authorized party).

We cannot respond to your request or provide you with personal information if we cannot verify your identity or confirm that the personal information relates to you. Submitting a verifiable consumer request does not require you to create an account with us.

Response Time and Method

We will respond to your verifiable request within 10 days of receipt. We will provide access to personal information within 45 days of receiving your request. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.



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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 information, such as a Social Security number or any other specific pieces of personal information, if the disclosure could result in unauthorized access that could result in fraud or other security risks. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Questions or Comments

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

Email	Website
dataprivacyrequests@ally.com	https://www.ally.com/privacy , via the "Contact" menu on the top of the page