

California Resident Notice at Collection and Privacy Policy

Summary

The TMX Finance® Family of Companies (and, its operating entities) (“we,” “our,” or the “Company”) respects your privacy and is committed to providing a transparent notice of our California Resident Notice at Collection and Privacy Policy pursuant to the California Consumer Privacy Act (“CCPA”). This California Resident Notice and Privacy Policy (the “Notice”) applies solely to those who reside in the State of California (“consumers” or “you”).

The purpose of this Notice is to provide California residents, at or before the time we collect your personal information, with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of consumers regarding your personal information:

- **Notice at Collection:**

Notice at or before the point of collection, about the categories of personal information to be collected from you and the purposes for which the personal information will be used.

- **CCPA Privacy Policy:**

A comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of your rights regarding your personal information, including:

- Your Right To Know (“RTK”) about personal information collected, used, and disclosed including:
 - Categories of personal information we collected in the preceding 12 months
 - Categories of sources from which personal information is collected
 - Categories of personal information, if any, we disclosed or sold in the preceding 12 months
 - For each category identified as disclosed or sold, categories of third parties to whom the information was disclosed or sold
- Transparency about personal information that we sell, and your right to opt-out of the sale of your personal information
- Your right to request deletion (“Right to Delete” or “RTD”) of your personal information
- How to submit a Verified Consumer Request (“VCR”) for your right to know or right to request deletion
- How to use an authorized agent to submit a VCR
- Your right to non-discrimination for the exercise of a privacy right
- Other California privacy rights
- Changes to our privacy notice
- Our contact information

Please note that if you are consumer or customer of a financial product or service used primarily for personal, family, or household use, such as a title loan/pawn/pledge, the Gramm Leach Bliley Act (“GLBA”) and California Financial Information Privacy Act (“CalFIPA”) govern the collection, use, and sharing of that data related to that account, not CCPA. There is an exemption to CCPA requests when data must be retained under the GLBA and/or CalFIPA.

Notice at Collection

The purpose of this Notice at Collection is to provide you with timely notice, at or before the point of collection, about the categories of personal information to be collected from you and the purposes for which the personal information will be used.

Do We collect?	Categories of Personal Information
<input checked="" type="checkbox"/>	A. Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
<input checked="" type="checkbox"/>	B. Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
<input checked="" type="checkbox"/>	C. Characteristics of CA or Federal Protected Classifications: For example, race, age, gender, disability, or military status.
<input checked="" type="checkbox"/>	D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
<input type="checkbox"/>	E. Biometric Information: For example, physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
<input checked="" type="checkbox"/>	F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement
<input checked="" type="checkbox"/>	G. Geolocation Data: For example, information that can be used to determine a device’s physical location
<input type="checkbox"/>	H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household

<input type="checkbox"/>	I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.
<input type="checkbox"/>	J. Education Information (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</i>): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual's identity in relation to an educational institution either directly or indirectly through linkages with other information.
<input checked="" type="checkbox"/>	K. Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Please note that Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act (DPPA) of 1994.

We use the personal information we collect for one or more of the following business purposes:

- Debugging to identify and repair errors
- For auditing relating to consumer transactions and compliance with laws and regulations
- For auditing relating to consumer transactions including ad impressions
- For internal and external investigations of criminal activity, fraud, and consumer complaints
- For marketing our services to you
- For our internal operation purposes
- For review in analyzing business trends or conducting business analysis
- For Risk-Based pricing
- For training opportunities and quality assurance purposes
- For underwriting
- Fraud and security detection and prevention

- Servicing transactions and accounts (e.g., customer service, maintaining, managing, collecting, and servicing accounts, customer verification, payment processing) and providing services on behalf of business or service provider (e.g., financing, advertising or marketing, analytics)
- Short-term data use for the current interaction that is not used to build a profile
- To act as Program Manager for Demand Deposit Agreement Accounts
- To comply with federal, state, or local laws, regulations, or ordinances
- To determine eligibility for credit services
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
- To fulfill or meet the reason for which the information is provided
- To honor your preferences
- To provide credit services
- To share the personal information with service providers to carry out other business purposes
- To verify residency
- 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.
- Undertaking internal research for technological development and demonstration.

We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing those categories.

You may exercise your Right to Opt-Out by clicking “Do Not Sell My Personal Information” on our website, <https://www.titlemax.com/california-title-loans/>, or submit a Verified Consumer Request by completing the form here <https://www.titlemax.com/optout/ccpa>. (Note: Opting out of selling is both device and browser specific. Opting out of one of our Company websites does not automatically opt you out for all Company websites, nor will you be opted out of our customer portal).

Privacy Policy

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of your rights regarding your personal information.

Your Right to Know

You have the right to request that the Company disclose what personal information it collects, uses, discloses, and sells. You can do this through a VCR. That process is described below in the section, “Submitting a Verified Consumer Request.”

We collect personal information, which means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or CA Resident Privacy Notice and Disclosure v.6.1 – Effective: 03.13.2020; Last Revised: 06.07.2021; Last Reviewed: 06.07.2021

household (“personal information”). The following table includes disclosures of categories of consumers’ personal information we have collected about consumers in the past 12 months, the categories we have disclosed for a business purpose and categories of third parties with whom we shared the personal information.

Category	In the preceding 12 months this category was:		Categories of third parties to whom the information was disclosed
	Collected	Disclosed	
A. Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Loan-Management and Point-of-Sale providers • Cloud-storage providers • Payment processors • Web-analytics providers • Web-hosting service providers • Point-of-Sale Providers and loan management providers • E-mail distribution service providers • Customer Service and Help Desk service providers • Financial, auditing, and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Service providers • Customer relationship management providers • Property preservation and inspection services • Third-party independent recovery servicers and providers • Auctions • Federal, State and local law enforcement
B. Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud-storage providers • Payment processors • Web-analytics providers • Web-hosting service providers • E-mail distribution service providers • Customer Service and Help Desk service providers • Financial, auditing, and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Customer relationship management tool providers

			<ul style="list-style-type: none"> • Property preservation and inspection services • Third-party independent recovery servicers and providers • Auctions • Federal, State and local law enforcement • Legal personnel (<i>e.g.</i>, mediators, arbitrators, attorneys, court personnel, bankruptcy trustees) • Financial institutions • Demand Deposit Agreement contractual parties • Credit Bureaus, Credit Reporting Agencies • Federal, state and local agencies (<i>e.g.</i>, the Department of Defense, Department of the Treasury, Department of Motor Vehicles, the Internal Revenue Service) • Federal, state and local regulators • Insurance companies
C. Characteristics of CA or Federal Protected Classifications	☒	☒	<ul style="list-style-type: none"> • Customer Service and Help Desk service providers • Point-of-Sale Providers • Service Providers • Financial, auditing, and accounting service providers • Customer relationship management providers • Third-party independent recovery servicers and providers • Federal, State and local law enforcement • Legal personnel (<i>e.g.</i>, mediators, arbitrators, attorneys, court personnel, bankruptcy trustees) • Financial institutions • Demand Deposit Agreement contractual parties • Credit Bureaus, Credit Reporting Agencies • Federal, state and local agencies (<i>e.g.</i>, the Department of Defense, Department of the Treasury, Department of Motor Vehicles, the Internal Revenue Service) • Federal, state and local regulators
D. Commercial Information	☒	☒	<ul style="list-style-type: none"> • Customer Service and Help Desk service providers • Financial, auditing, and accounting service providers

			<ul style="list-style-type: none"> • Cybersecurity service providers • Customer relationship management providers • Federal, State and local law enforcement • Legal personnel (e.g., mediators, arbitrators, attorneys, court personnel, bankruptcy trustees) • Financial institutions • Demand Deposit Agreement contractual parties • Federal, state, and local agencies • Federal, state, and local regulators • Service providers
E. Biometric Information	<input type="checkbox"/>	<input type="checkbox"/>	
F. Internet or Other Similar Network Activity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Data management service providers • Marketing vendors and providers
G. Geolocation Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud-storage providers • Web-analytics providers • Web-hosting service providers • Customer Service and Help Desk service providers • Cybersecurity service providers • Customer relationship management providers • Federal, State and local law enforcement • Legal personnel (e.g., mediators, arbitrators, attorneys, court personnel, bankruptcy trustees) • Federal, state and local regulators • Marketing providers and marketing service providers • Service providers • Financial institutions
H. Sensory or Surveillance Data	<input type="checkbox"/>	<input type="checkbox"/>	
I. Professional or Employment-Related Information	<input type="checkbox"/>	<input type="checkbox"/>	
J. Education Information	<input type="checkbox"/>	<input type="checkbox"/>	
K. Profile Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Web-analytics providers • Web-hosting service providers

			<ul style="list-style-type: none"> • Marketing providers and marketing service providers • Service providers • Cybersecurity service providers • Logistics and planning tool providers • Federal, State and local law enforcement • Legal personnel (e.g., mediators, arbitrators, attorneys, court personnel, bankruptcy trustees) • Financial institutions • Demand Deposit Agreement contractual parties
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The categories identified as collected in the table above were collected from the following categories of sources:

- You directly (actively or passively)
- Marketing partners
- Marketing service providers
- Surveillance service providers
- Credit reporting agencies and credit bureaus
- Business partners
- Mechanics
- Service providers
- Government entities such as the Department of the Treasury, Department of Defense, and the Department of Motor Vehicles
- Financial institutions

What We Sell and Right to Opt-Out

The Company does not sell the personal information of minors under 16 years of age. The Company sells and has sold personal information to third parties in the preceding 12 months as disclosed in the table below. As a California resident, you have the right to direct Company to stop selling your personal information, and to refrain from doing so in the future, which is called the “Right to Opt-Out.”

You may exercise your Right to Opt-Out by clicking “Do Not Sell My Personal Information” on our website, <https://www.titlemax.com/california-title-loans/>, or submit a Verified Consumer Request by completing the form here <https://www.titlemax.com/optout/ccpa>. (Note: Opting out of selling is both device and browser specific. Opting out on one of our Company websites does not automatically opt you out for all Company websites, nor will you be opted out of our customer portal).

Opting out of selling is both device and browser specific. If you want to opt-out with all of your devices and all browsers you use, you will need to revisit this site and submit another request (click the Do Not Sell button again) from each device and with each browser you want to be opted out of. Please note: If you clear your

cache (browser history or cookies) and visit our site at a later date, you must submit a new opt-out request in order to keep your opt-out status.

In the event you opt out of selling for purposes of the CCPA, but you do not opt out of interest-based advertising more generally, you may receive advertisements tailored to your interests based upon personal information (a) not sold by us; or (b) sold by other sources or companies from which you have not opted out. To learn more about interest-based advertising across sites and additional opt-out choices, you can visit one or more industry opt-out links (e.g., <https://optout.aboutads.info/?c=2&lang=EN>, <https://optout.networkadvertising.org/?c=1#>, and <https://youradchoices.com/appchoices>).

Authorized Agent for Opt-Out: If you use an authorized agent to exercise your right to opt-out of the sale of personal information, please note that the Company requires that the authorized agent submit proof in the form of a written authorization from you that they have been authorized to act on your behalf.

Under the California Consumer Protection Act (CCPA), some of our sharing activities may be considered a "sale" that you have a right to opt-out of. Below is a list of categories of information (as these categories are defined by the CCPA) we may have "sold":

We have sold.	What personal information has [Company] sold to third parties over the last 12 months?	Categories of third parties to whom this category of personal information has been sold
<input checked="" type="checkbox"/>	F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement	Third-Party marketing providers
<input checked="" type="checkbox"/>	G. Geolocation Data: For example, information that can be used to determine a device’s physical location	Third-Party marketing providers

Please note that information sold as disclosed in this section may be re-sold by downstream entities to which it was sold. You have the right to opt-out of this re-selling. You can exercise this right to opt-out of re-selling by clicking on this link, <https://www.iabprivacy.com/optout.html> and then opting-out of selling on an entity’s site.

Your Right to Request Deletion of Your Personal Information

You have the right to request that the Company delete any of your personal information collected or maintained by the Company, subject to certain exceptions. You can do this through a VCR. That process is described below in the section, "Submitting a Verified Consumer Request."

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Submitting a Verified Consumer Request

You have the right to submit a VCR to know information or for deletion. The request to know can be for any or all of the following about you:

- (1) Specific pieces of personal information that the Company has;
- (2) Categories of personal information the Company has collected;
- (3) Categories of sources from which the personal information was collected;
- (4) Categories of personal information that the Company sold or disclosed for a business purpose;
- (5) Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- (6) The business or commercial purpose for collecting or selling personal information.

Please note that we are not required to provide personal information to you more than twice within a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. We will only use personal information provided in a VCR to verify the requestor's identity or authority to make the request.

You can submit a VCR using the following <https://www.titlemax.com/optout/ccpa> or by calling (844) 672-7527. Your request will be verified using information you provide as described on the webform (<https://www.titlemax.com/optout/ccpa>). If you call (844) 672-7527 you will be asked to provide the same information requested on the webform for verification purposes.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will either treat it as if it had been submitted in accordance with our designated methods or provide you with information on how to submit the request or remedy any deficiencies.

Once we receive your VCR, we will send you an acknowledgement within 10 business days which will describe our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

If requests from you are manifestly unfounded or excessive in particular because of their repetitive character, we may either charge a reasonable fee or refuse to act on the request, notifying you of our reason for refusing to act. If we determine that the request warrants a fee, we will notify you of the reason for that determination and provide you with a cost estimate before completing your request.

Please note that, in responding to your request, we are not permitted to disclose or provide you with your 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, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. However, we will inform you with sufficient particularity that we have collected the type of information without disclosing the actual data.

Using an Authorized Agent to Submit a Request

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a VCR related to your personal information. You may also make a VCR on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If you do not submit a power of attorney that meets those provisions, you must provide your authorized agent with signed permission to submit a request on your behalf. You must also verify your identity directly with us, and confirm that you have provided the authorized agent with permission to submit the request.

If you’re an authorized agent making a VCR you need to do the following using the e-mail in the contact section below:

(a) e-mail a copy of a power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or

(b) e-mail proof of signed permission along with a copy of your ID and have the consumer directly confirm with us that they provided you permission to submit the request by sending an e-mail.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your California Consumer Privacy Act (“CCPA”) rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to RTK@titlemax.com or write us at: Legal Department, 15 Bull Street, Suite 200, Savannah, GA 31401.

The Company responds to Do Not Sell Opt-Out requests as disclosed in the section “What We Sell and Right to Opt-Out.” Otherwise, the Company does not respond to Web browser “do not track” signals or other mechanisms.

Other parties may collect personally identifiable information about your activities over time and across different Web sites when a consumer uses our website or service.

Changes to Our Privacy Notice

The Company reserves the right to amend this California Resident Privacy Notice and Disclosure (the “Notice”) at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on the website and update the Notice’s effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

Contact for More Information

If you have any questions about this Notice, the ways in which the Company collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 844-672-7527
Website: <https://www.titlemax.com/california-title-loans/>
Email: rtk@titlemax.com
Postal Address: TMX Finance Family of Companies
ATTN: Legal Department
15 Bull Street, Suite 200
Savannah, GA 31401
