

California Consumer Privacy Notice

Effective Date: January 1, 2020; Last Updated: January 28, 2020

Applicability

This Policy applies only to visitors and members that reside in the state of California. This Policy does not apply to information we collect, process, or disclose about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act or California Financial Information Privacy Act). For more information about how we collect, use, and disclose information for members, please refer to our [U.S. Consumer Privacy Notice](#).

Your Personal Information

This policy supplements our [online and mobile privacy policy](#). Please review that policy to learn about the information we collect, the sources from which we collect it, the purpose for collecting it, and instances where we may share it.

In the past 12 months, we have collected the following categories of Personal Information relating to California residents:

- Identifiers, such as name, address and Social Security number;
- Personal information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as transaction and account information;
- Internet or network activity information, such as browsing history and interactions with our website;
- Geolocation data, such as device location;
- Audio, electronic, visual, or similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer;
- Education information, such as school and date of graduation; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

The purposes for which we use Personal Information that we collect depends on our relationship or interaction with a specific California resident. We may use Personal Information to operate, manage, and maintain our business, to provide our products and services, for our employment and vendor management purposes, and to accomplish our business purposes and objectives, including, for example, using Personal Information to personalize, develop, and market our products and services, conduct research and data analysis, detect and prevent fraud, maintain our facilities, systems and infrastructure, perform accounting, audit, and other internal functions, such as internal investigations, comply with law, legal process, and internal policies, maintain business records, and exercise and defend legal claims.

In the past 12 months, we have disclosed the following categories of Personal Information relating to California residents to third parties for our business purposes:

- Identifiers, such as name and Social Security number;

- Personal information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as transaction and account information;
- Internet or network activity information, such as browsing history and interactions with our website;
- Geolocation data, such as device location;
- Audio, electronic, visual, or similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer;
- Education information, such as school and date of graduation; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

Your Rights

If you reside in California and are not a job applicant, employee or employee of another company interacting with us in your job role, you have the right to ask us what information we collect and use. You also have the right to ask what information we disclose and sell. This covers the 12 months preceding your request. You also have the right to request that we delete information we have collected from you.

To exercise your rights contact us at (877) 732-2848 or use this [CCPA Request form](#) to make requests by mail or in person. Upon submission of your request, we will take steps to verify your identity. Those steps may vary depending on how you have submitted your request and your relationship to us. We will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act. You can designate someone else to make a request by having them execute a notarized power of attorney to act on your behalf.

Sale of Information

Under California law we are required to tell California residents if we "sell" information as that term is defined by applicable law. Sell means to share personal information with a third party for monetary or other valuable consideration. California residents, we do not do this based on our understanding of that term. We also do not sell personal information of minors under the age of 16.

Contact Us

If you have any questions about this Policy or our data practices, please contact us at: (877) 732-2848, or write to us at:

PO Box 261209
San Diego, CA 92196-1209

Updates

We may change this Policy from time to time. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our website and app. Please check our site periodically for updates.