

PRIVACY POLICY-CALIFORNIA (EMPLOYEES)

This PRIVACY POLICY FOR CALIFORNIA RESIDENTS (EMPLOYEES) applies to CALIFORNIA CHECK CASHING STORES, LLC and its affiliates- CCFI FUNDING, LLC (dba Cash Central), BUCKEYE CHECK CASHING OF CALIFORNIA, LLC (dba Cash 1), GALT VENTURES, LLC (dba Speedy Cash), BUCKEYE TITLE LOANS OF CALIFORNIA, LLC, and CHECK INTO CASH OF CALIFORNIA, INC., (collectively, “we,” “us,” or “our”) and applies solely to employment candidates, employees, independent contractors, contractors, temporary or agency workers, occasional workers, freelancers, volunteers, apprentices, owners, directors, officers, and other individuals engaged by us who reside in the State of California (“employees” or “you”). We adopt this policy to comply with the California Consumer Privacy Act (“CCPA”) and other California privacy laws and regulations. Any terms defined in the CCPA – including the term “consumer” – have the same meaning when used in this policy.

Notice at Collection

We collect the categories of personal information as described under the “Personal Information We Collect” section below and use these categories of personal information for the purposes as described under the “Use of Personal Information” section below. We do not sell or share your personal information as defined in the CCPA. We retain your personal information as described below under the “Retention of Personal Information (Including Sensitive Personal Information)” section.

Personal Information We Collect

We collect personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee or device (“personal information”). In particular, we have collected the following categories of personal information from employees within the last twelve (12) months:

- Identifiers, such as name, date of birth, home address, telephone numbers, Social Security number, driver license number or state ID number, military ID or passport as alternative to driver license/state ID, and email address.
- Personal information, such as physical characteristics/description as set forth on ID provided, consumer signature as set forth on ID provided & certain transaction documents, and relation to listed references, and other personal information as appropriate.
- Financial information, such as pay frequency & use of direct deposit, bank/credit union name, routing number & checking or share account number.
- Protected classification characteristics under California or federal law such as age (40 years or older- as derived from DOB information), race, citizenship, sex and/or marital status, physical or mental disability (in connection with ADA or regulatory compliance), and veteran or military status (National Guard obligations).
- Commercial information, such as records of credit reporting to CRAs, and records of credit scores and underwriting determinations.
- Biometric information such as a copy of photo identification provided (photo with physical description-e.g., Driver’s License), and copy of fingerprints if on certain consumer provided documents (e.g., State IDs).
- Internet or network activity information, such as information on an employee’s interaction with our website or mobile device, application, or computer network.
- Audio, visual, electronic, and similar information, such as visual information data may be obtained via a store camera at the time of employment locations, and audio information via recording phone conversations with notice in connection with handling complaints and undertaking collections. Such information is not stored beyond a limited period absent an active

investigation, arbitration, lawsuit, law enforcement/government regulatory request or judicial/administrative order.

- Professional or employment-related information, such as employer's name and address, work phone number, job title, current or past job history or performance evaluations.
- Health information, such as medical information, or health insurance information, names of spouse, designated beneficiaries, and emergency contacts.
- Inferences drawn from any of the personal information listed above to create a profile about, for example, profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- Sensitive personal information, such as Social Security, driver's license, state identification card, passport number, self-identified racial or ethnic origin, citizenship or immigration status, and personal information collected and analyzed concerning an employee's health. Please note that we do not use your sensitive personal information to infer characteristics about you.

*The term "share" and "sharing" is defined in the law as *"making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising."* (Cal. Civ. Code §1798.140(ah)(1))

Personal information does not include:

- Publicly available information from government records, or lawfully obtained, truthful information that is a matter of public concern.
- De-identified or aggregated employee information.
- Certain information that may be exempt from certain obligations under the CCPA like:
 - Protected health or medical information that is collected by a covered entity or business associate governed by the privacy, security, and breach notification rules established pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, or personal information collected as part of a clinical trial or other biomedical research subject to, or conducted in accordance with, the Federal Policy for the Protection of Human Subjects;
 - Personal information collected, processed, sold, or disclosed subject to 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).

We may obtain the categories of personal information listed above from the following categories of sources:

- Directly from employment applicants, and employees or their agents. For example, from information persons provide or we obtain in connection with their employment or seeking employment with us.
- Indirectly from employment applicants, and employees or their agents. For example, through information we have obtained from you, and you have supplied in seeking employment through employment agencies.
- Directly and indirectly from activity on our website, computer network, or company devices. For example, from submissions through our website portal or website usage details that are collected automatically.
- From service providers and third parties that interact with us in connection with an individual's employment or employment application. For example, from a credit service agency when we review an individual's employment application.

- Other third parties, such as advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, social networks, and data brokers.

Use of Personal Information

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

- To provide you with information, benefits or services in connection with your employment.
- To review your application for employment.
- To provide you with information about employee benefits, training or opportunities of interest to you.
- To fulfill or meet the reason for which the personal information is provided. For example, if you provide us with personal information in order to seek employment with us, we will use that information to review your qualifications and as otherwise needed to complete the hiring process or decline the employment application.
- To provide you with telephone, text and email messages and reminders, and notices concerning your employment, including work schedule.
- To carry out our obligations and enforce our rights arising from any agreements entered into between you and us, including pay or benefits.
- To ensure adherence by you to our obligations under state and federal laws, as well as our business policies and performance of your employment duties.
- To carry out our obligations and enforce our rights arising from any agreements we have acquired from others, or under which we have obligations involving employees retained in a merger or acquisition.
- To improve our website and/or mobile application and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to prevent fraud upon you or us and protect the rights, property or safety of us, our customers or others.
- To respond to state or federal regulators, law enforcement requests and as required by applicable law, court order, administrative ruling, consent agreement, settlement or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- 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 bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- To audit related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and complying with this specification and other standards.
- To help ensure security and integrity to the extent the use of the employee's personal information is reasonably necessary and proportionate for these purposes.
- To debug, identify, and repair errors that impair existing intended functionality.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of an employee's current interaction with the business, provided that the employee's personal information is not disclosed to another third party and is not used to build a profile about the employee or otherwise alter the experience outside the current interaction with the business.

- To perform services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying employee information, processing payments, providing analytic services, providing storage, or providing similar services on behalf of the business.
- To provide advertising and marketing services, except for cross-context behavioral advertising, to the employee, provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out employees that the service provider or contractor receives from, or on behalf of, the business with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with employees.
- To undertake internal research for technological development and demonstration.
- To undertake 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.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Retention of Personal Information (Including Sensitive Personal Information)

We retain personal information, including sensitive personal information, for the time necessary to fulfill the purpose(s) for which it was collected, including to provide requested financial services and products resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and conform with our obligations with state and federal law requirements.

Disclosing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter 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 performing the contract. You have a right to opt-out of sharing personal information for non-business or marketing purposes under the CCPA, see below for further explanation of this right.

In the preceding twelve (12) months, we may have disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Internet or other electronic network activity information.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.
- Education information.
- Inferences drawn from any of the personal information.
- Sensitive personal information.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates to the extent permitted by state law.
- Service providers.
- Third parties and contractors to whom you or your agents authorize us to disclose your personal information in connection with your employment. These include:
 - Government entities
 - Operating systems
 - Health insurance providers
 - Banks and other financial institutions
 - Advertising networks
 - Internet service providers
 - Data analytics providers
 - Social networks
 - Data brokers

In the preceding twelve (12) months, we have not sold any personal information, nor have we disclosed your personal information for purposes other than needed in connection with your employment, to conduct business and/or transactions and services requested.

Your Rights and Choices as Employees

The CCPA provides California resident employees with specific rights regarding their personal information. This section describes your CCPA rights you may have and explains how to exercise those rights.

Right to Know or Access Rights

You have the right to know and request that we disclose certain personal information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable employee request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties and contractors, if any, with whom we share that personal information.
- The specific types/pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable employee

request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. For deletion requests made online, a separate second confirmation of the deletion request shall be required. In responding to a request to delete please note that we will maintain a record of the request pursuant to Cal. Civil Code section 1798.105(d).

We may deny your deletion request if retaining the personal information is necessary for us or our service providers to:

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another employee to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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 personal information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with employee expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that personal information that are compatible with the context in which you provided it.

Right to Correct Inaccurate Personal Information

You have the right to request that personal information that we have collected and hold if inaccurate be corrected. Once we receive and confirm your verifiable employee request, we will undertake a review and amend and correct your personal information found to be inaccurate (and direct our service providers/contractors to do the same). For correction requests involving online accounts, a separate call to our Cash Central service center: 800-460-4305 may be required. For correction requests on retail accounts depending on the level of sensitive personal information requested for correction, we may require proof of identity and/or proof of the correct information prior to fulfilling your request; and that for your security, we may request you visit your local store to complete the request. Nothing in the CCPA prevents you from seeking to correct personal information obtained or provided for employment purposes or in the course of employment, from alternatively contacting our Human Resources Department at 1-614-798-5900, ext. 5315.

Right to Limit Use or Disclosure of Sensitive Personal Information

You have the right to request that we limit the use or disclosure of what the CCPA deems sensitive personal information (see above for such sensitive personal information that we collect). This limitation would restrict using or disclosing your sensitive personal information to only that which is necessary in connection with your employment or for providing products or services. Note that we presently do not use or disclose an employee's sensitive personal information except for as needed in connection with your employment or for providing requested products or services or as allowed by the CCPA and the rules thereunder.

Exercising Access, Correction, and Deletion Rights

To exercise the access, correction, and deletion rights described above, please submit a verifiable employee request to us by either:

- Calling us at 800-460-4305 (Cash Central) or 855-920-9800 (CCCS/Cash 1/Check Into Cash); or at 1-888-333-1360 (Speedy Cash)
- Visiting www.ccfi.com and completing the form found at <https://www.ccfi.com/ccpa-form/> or for Speedy Cash visiting www.speedycash.com and completing the form found at <https://www.ccfi.com/ccpa-form/>
- Visiting the California Check Cashing Store/Cash 1/Check Into Cash/or Speedy Cash store where you obtained your loan or check cashing services to file your request.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable employee request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. Note that we do not knowingly collect, share or sell personal information on persons of 16 years of age or less.

You may only make a verifiable employee request to know or access twice within a 12-month period. The verifiable employee request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

In order to verify your request, you must provide, *inter alia*, the following information:

- Name, current mailing address, current email address
- Date of birth (if not a current or former employee)
- A current telephone number
- If acting as an agent, a signed attestation by the employee of authorization.
- Other personal information as directed if we are unable to match and confirm verification

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 the personal information relates to you. Making a verifiable employee request does not require you to create an account with us. We will only use personal information provided in a verifiable employee request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable employee request within 45 days of its receipt. If we require more time (up to an additional 45 days, hence 90 days total), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable employee request's receipt unless you request disclosures beyond a 12-month period and proving the personal information would not be impossible or involve a disproportionate effort. The response we provide will also explain any reasons we cannot comply with a request, if applicable. For requests to

know, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable employee request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of Sale and/or Sharing of Personal Information

We do not presently engage in the sale of employees' personal information. Under state law you have the right to opt-out of the sale of your personal information. Similarly, we do not presently engage in the sharing of employee personal information to third-parties. Under state law you have the right to opt-out of the sharing of your personal information. The term "sharing" is defined in the law as "making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising." (Cal. Civ. Code §1798.140(ah)(1)). To exercise your opt-out right from selling or sharing of your personal information, you may do so by going to our website at: www.ccfi.com and use the link <https://www.ccfi.com/ccpa-form/> or <https://www.cashcentral.com/> and use the link <https://www.cashcentral.com/DataPrivacy/Inquiry>. For Speedy Cash you may do so by going to our website at: www.speedycash.com and use the link <https://www.ccfi.com/ccpa-form/>

Employees online may also use the following link(s)

CCCS/Cash 1/Check Into Cash Retail

Do Not Sell or Share My Personal Information link: <https://www.ccfi.com/ccpa-form/>

Cash Central

Do Not Sell or Share My Personal Information link:
<https://www.cashcentral.com/DataPrivacy/Inquiry>

Speedy Cash

Do Not Sell or Share My Personal Information link: <https://www.ccfi.com/ccpa-form/>

Non-Discrimination and Non-retaliation

We will not discriminate or retaliate against you for exercising any of your 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.

Right to Bring an Action for a Data Breach of Your Personal Information

Under the CCPA, consumers, including employees, who are California residents, have a right to bring an action against a covered business if your personal information is subject to theft or disclosure in a data breach as a result of the business's failure to implement and maintain reasonable security procedures.

Changes to Our Privacy Policy to Employees

We reserve the right to amend this privacy policy at our discretion and at any time. We will update this policy at least every 12 months. When we make changes to this privacy policy, we will notify as required under applicable law, which may include by email, text, mail or through a notice on our website homepage. If you have been or become a consumer with us in a context other than an employee (for example- a prior or current loan customer) then you should consult the general Privacy Policy posted at our website (www.cashcentral.com) for other rights that you may have.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal 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: 1-855-920-9800, ext. 5315

Websites: www.cashcentral.com or www.ccfi.com
or www.speedycash.com

Email: hr@ccfi.com

Postal Address: CCCS/Cash 1/Cash Central/Check Into Cash/Speedy Cash

Attn: Human Resources – CCPA

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