

PRIVACY POLICY-CALIFORNIA

This PRIVACY POLICY 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., and any other affiliates who post this privacy policy (collectively, “we,” “us,” or “our”) and solely to customers, users, and other individuals who reside in the State of California (“consumers” or “you”). We adopt this policy to comply with the California Consumer Privacy Act of 2018 (“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 may sell or share your personal information. 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 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 (“Personal Information”). In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

- Identifiers, such as name, date of birth, home address, telephone numbers, Social Security number, government issued identification cards and numbers, military identification or passport as alternative to driver license or state identification, military status for covered borrower, email address, and IP address (if internet customer/user/applicant) or other similar identifiers.
- Personal information, such as consumer physical characteristics/description as set forth on identification provided, consumer signature as set forth on identification provided, and certain transaction documents, addresses, and relation to listed references.
- Financial information, such as pay frequency, use of direct deposit, date of most recent paycheck/or other primary income payment (loan applicants only), primary source of income if not employed, net monthly/pay period income (loan applicants only), estimated monthly/pay period expenses, bank/credit union name, routing number & checking or share account number, or debit card number.
- Health information, such as medical information, or health insurance information (as to our employees), names of spouse, designated beneficiaries, and emergency contacts (as to our employees).
- Protected classification characteristics under California or federal law such as age (40 years or older- as derived from date of birth information), race, citizenship, sex and/or marital status (as indicated or evident from identification/passport documents), physical or mental disability (as indicated in guardian or power of attorney documents provided; or noted in connection with Americans with Disabilities Act (ADA) or regulatory compliance), and veteran or military status.
- Commercial information, such as records of personal property (vehicle information if used to secure loan), products and services purchased, payment histories, receipts and balances in connection with products and services provided, adverse action notices, risk-based pricing

notices, credit reporting to consumer reporting agencies, and credit scores and underwriting determinations.

- Biometric information such as a copy of photo identification provided (photo with physical description - e.g., driver's license), customer store photo upon initial account application at retail locations, and copy of fingerprints if on certain consumer provided documents (e.g., power of attorney; state identification cards).
- Internet or network activity information, such as information on a consumer's interaction with our website or mobile device, application, or advertisement.
- Geolocation data, such as when obtained regarding consumer location at the time of interaction with our website or mobile device application.
- Audio, visual, electronic, and similar information, such as visual information data that may be obtained via a store camera at the time of consumer transactions at retail locations, and audio information via recording phone conversations with notice in connection with handling complaints and undertaking collections.
- Professional or employment-related information, such as employer's name and address, work phone number, or job title (as to our loan applicants).
- Professional or employment-related information, such as current or past job history or performance evaluations (only as to our employees or employee applicants).
- Inferences drawn from any of the personal information listed above to create a profile about, for example, profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Sensitive personal information, such as Social Security, driver's license, state identification card, or passport number, financial account, credit card, debit card number, and precise geolocation within 1,850 ft. Personal information such as racial or ethnic origin, sex, and approximate height are collected only in Georgia and Alabama as required by state pawn broker laws. **

**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))*

** Please note that we do not use your Sensitive Personal Information to infer characteristics about you.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Certain information may be exempt from certain obligations under the CCPA, like:
 - Protected health 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 (HIPAA); medical information governed by the California Confidentiality of Medical Information Act (CMIA); 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), California Financial Information Privacy Act (FIPA), or the Driver's Privacy Protection Act

We may obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from consumers, including customers and applicants for our products or services, employment applicants, and employees or their agents. For example, from application documents that consumers provide us in connection with seeking loans, money transmission transactions or check cashing services; or information persons provide in connection with their employment or seeking employment with us.
- Indirectly from consumers, including customers and applicants for our products or services, employment applicants, and employees or their agents. For example, through information we have obtained from, and you have supplied to lead providers by consumers seeking the types of services and products we provide; or seeking employment through employment agencies.
- Directly and indirectly from activity on our website. 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. For example, from government database sources when we review a loan applicant's military status as required for compliance with the federal Military Lending Act; or information obtained from credit reporting agencies.
- Other third parties, such as advertising networks; Internet service providers; data analytics providers; other governmental entities; operating systems and platforms; social networks; and data brokers.

Use of Personal Information

We may use any of the categories of Personal Information we collect for one or more of the following business purposes:

- To provide you with information, products or services that you request from us.
- To conduct underwriting analysis and determine creditworthiness.
- To provide you with information about products, services or offers that may be of interest to you.
- To fulfill or meet the reason for which the 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, adverse action notices and other notices concerning our products or services, that you have requested, obtained or that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any agreements entered into between you and us, including for billing and collections.
- To carry out our obligations and enforce our rights arising from any agreements we have acquired from others, or under which we have servicing obligations involving transaction in which you have entered, including for billing and collections.
- 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 consumer'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 a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's 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 customer information, processing payments, providing financing, 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 consumer, provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers 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 consumers.
- 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 comply with applicable laws and regulations. Once deidentified, we will not attempt to re-identify the Personal Information, except to test that our deidentification procedures.

Note that as a licensed and regulated lender, debt collector/buyer, as well as a money service business, we are subject to various state and federal laws that require retention of records. These include the California Deferred Deposit Transaction Act, Cal. Fin. Code § 23000 (2 years from last entry); California Financing Law, Cal. Fin. Code § 22000 (3 years from last entry); California Check Cashers Law, Cal. Civ. Code § 1789.35 (4 year right of action); federal Fair Credit Reporting Act 15 U.S.C. § 1681p (actions up to 5 years); Equal Credit Opportunity Act, 15 U.S.C. § 1691e (actions up to 5 years); Bank Secrecy Act 12 U.S.C. § 1829b(g) (retention up to 6 years possible- maximum 5 years currently); Federal Truth in Lending Act per 10 C.F.R. 1026.25 (2 years general requirement) see also 15 U.S.C. §§ 1607 and 1640 (1 year from violation for civil action; administrative action date of last CFPB examination; CFPB actions for unfair deceptive or abusive acts & practices under 12 U.S.C. § 5531- 3 years from date of discovery 12 U.S.C. § 5564(g); obligation to validate debts per 15 U.S.C. § 1692g and bankruptcy debts reports per FCRA 15 U.S.C. § 1681c (7-10 years); And Electronic Funds Transfer Act 12 C.F.R. 1005.13 (2 years).

Disclosing Personal Information

We may disclose your personal information to a third party or contractor 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 as permitted under the contract. You have a right to opt-out of sharing Personal Information for cross-context behavioral advertising under the CCPA, see below for further explanation of this right.

In the preceding twelve (12) months, we may have disclosed any of 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
- Professional or employment-related information.
- Sensitive Personal Information

We may disclose your Personal Information for a business purpose to any of the following categories of third parties:

- Our affiliates to the extent permitted by state law
- Service providers
- Third parties and Contractors as needed to process, complete or maintain record of your transactions; or to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.
- Other third parties may include:
 - Data Analytics providers
 - Government entities
 - Operating systems
 - Credit Reporting Agencies
 - Banks and other financial institutions

We may sell Personal Information as described in this privacy policy, or if we provide you with notice and a right to opt-out of such sale.

Your Rights and Choices Under the CCPA

The CCPA provides consumers (California residents) 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 information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer 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 disclose 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 consumer 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 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 consumer 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 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 consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that 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 consumer 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.

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. This limitation would restrict using or disclosing your Sensitive Personal Information to only that which is necessary for providing products or services. Note that we presently do not use or disclose a consumer's Sensitive Personal Information except for as needed 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 consumer request to us by either:

- Calling us at 1-800-460-4305 (Cash Central) or 1-855-920-9800 (CCCS/Cash 1/Check Into Cash/Speedy Cash)
- For Cash Central visit www.cashcentral.com and completing the form found by choosing **Do Not Sell or Share My Personal Information** found on the home page of the site. [For CCCS/Cash 1/Check Into Cash by visiting www.ccfi.com](http://www.ccfi.com) and completing the form found by choosing **Do Not Sell or Share My Personal Information** located on the home page for the site or for Speedy Cash visiting www.speedycash.com and completing the form found by clicking the link **Do Not Sell or Share My Personal Information**.
- 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 consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child under 13 years of age. Note that we do not knowingly collect, share or sell Personal Information of persons of 16 years of age or less.

You may only make a verifiable consumer request to know or access twice within a 12-month period. The verifiable consumer 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 customer)
- A current telephone number
- If acting as an agent, a signed attestation by the consumer of authorization.
- Other 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 consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer 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 consumer request's receipt unless you request disclosures beyond a 12-month period and providing the 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 consumer 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 consumer Personal Information. Under state law you have the right to opt-out of the sale of your Personal Information. To exercise that right, you may do so by going to our website at: Cash Central, www.cashcentral.com and completing the form found by choosing **Do**

Not Sell or Share My Personal Information found on the home page of the site. For CCCS/Cash 1/Check Into Cash by visiting www.ccfi.com and completing the form found by choosing **Do Not Sell or Share My Personal Information** located on the home page for the site or for Speedy Cash visiting www.speedycash.com and completing the form found by clicking the link **Do Not Sell or Share My Personal Information**.

Similarly, we do not presently engage in the sharing of consumer 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 that right, you may do so by going to our website at: Cash Central, www.cashcentral.com and completing the form found by choosing **Do Not Sell or Share My Personal Information** found on the home page of the site. For CCCS/Cash 1/Check Into Cash by visiting www.ccfi.com and completing the form found by choosing **Do Not Sell or Share My Personal Information** located on the home page for the site or for Speedy Cash visiting www.speedycash.com and completing the form found by clicking the link **Do Not Sell or Share My Personal Information**.

Consumers 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.

Changes to Our Privacy Policy

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 by posting the updated policy on our website with its effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this policy, our Privacy Statement, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, wish to exercise your rights under California law, or seek to obtain or access this policy in an alternative format due to a disability, please do not hesitate to contact us at:

Phone: 1-800-460-4305 (Cash Central)

or 1-855-920-9800 (CCCS/Cash 1/Check Into Cash/ Speedy Cash retail)

Websites: <https://www.cashcentral.com/>, www.ccfi.com or <http://www.speedycash.com>

Email (Cash Central): verification2@ccfi.com

Email (CCCS/Cash 1/Check Into Cash/Speedy Cash retail): customer.service@ccfi.com

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

Attn: Privacy Officer, CIPP/US

2312 E. Trinity Mills Road, Suite 100

Carrollton, TX 75006

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