

# **PRIVACY STATEMENT - CALIFORNIA**

This **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS** supplements the information contained in the Privacy Statement of **Century Automotive Service Company** and its subsidiaries (collectively, "we," "us," or "our") and applies solely to customers, contract holders, visitors, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect

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

| Category  | Examples   | Purposes  |
|---|--|---|
| A. Identifiers.*  | A real name, customer name, customer postal address,<br>customer phone number, vehicle information, email<br>address.  | To: make contact with you when you are our customer or employee; conduct customer or employee needs assessments; improve the quality of products and services we deliver to customers and employees; build statistical models; process employee payroll; administer and maintain employee benefits including health insurance, 401K and/or retirement plans; and effectively manage and support employees throughout the hiring, onboarding, employment, and post-employment phases of their relationship with us, including to conduct background checks to ensure that employees satisfy company policies required to carry out their duties. |
| B. Personal Information<br>categories listed in the<br>California<br>Customer Records statute<br>(Cal. Civ.<br>Code §1798.80(e).* | A name, signature, address, telephone number, and claims information. Some personal information included in this category may overlap with other categories.   | To: make contact with you when you are our customer or employee; conduct customer or employee needs assessments; improve the quality of products and services we deliver to customers and employees; build statistical models; process employee payroll; administer and maintain employee benefits including health insurance, 401K and/or retirement plans; and effectively manage and support employees throughout the hiring, onboarding, employment, and post-employment phases of their relationship with us, including to conduct background checks to ensure that employees satisfy company policies required to carry out their duties. |
| C. Commercial Information.*   | Records of personal property, products or services purchased, obtained or considered.  | To: Conduct any claim or question from our customer.  |
| D. Professional or<br>employment-related<br>information.*   | Current or past job history or performance evaluations.  | During the hiring process, we conduct background checks on prospective employees before finalizing an offer of employment.  |
| E. Non-public education information.*   | Education records directly related to a student<br>maintained by an educational institution or party acting<br>on its behalf, such as grades, transcripts, class lists,<br>student schedules, student identification codes, student<br>financial information, or student disciplinary records. | During the hiring process, we conduct background checks on prospective employees before finalizing an offer of employment. Such background checks may include requesting non-public education information.  |
| F. Inferences drawn from other personal information.*   | Profile reflecting a person's preferences, characteristics,<br>psychological trends, predispositions, behavior,<br>attitudes, intelligence, abilities, and aptitudes.  | During the hiring process of prospective employees, and periodically with current employees, we may conduct personality and/or leadership assessments.  |

\*In the past twelve (12) months, we have disclosed one or more data types in the following categories of Personal Information for a business purpose.

We obtain the categories of personal information listed above from the following categories of sources: • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us; and • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them and their consumers.

Personal information does **not** include: • publicly available information from government records; • de-identified or aggregated consumer information; and Information excluded from the CCPA's scope, such as: 1. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and 2. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We share your personal information with the following categories of third parties: • industry regulators, law enforcement agencies or other governmental authorities; • anti-fraud organizations; • third parties who assist us in processing the transactions authorized by you and in providing services to us and to you; • companies within the MAPFRE Insurance group; • your insurance agent or broker (if applicable); • third parties with whom we have joint marketing agreements in order to market our products; • third parties who help us conduct research and analyze data to improve our products and services; • attorneys or other authorized persons in connection with matters in litigation, as required by subpoenas and court rules and orders; • our attorneys, accountants, and auditors; and • other such parties as are specifically permitted or required by law.

## 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, products or services that you request from us; • to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections; • as necessary or appropriate to protect the rights,



property or safety of us, our clients or others; and • to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. 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. In addition, the information may also assist us with managing our business including but not limited to: maintaining business continuity plans, conducting internal audits, building actuarial and statistical models, and fulfilling various legal requirements, or to perform obligations under an existing contract with You.

We do not sell your information. We limit access to your personal and privileged information to those persons who need to know it to perform their jobs and to provide service to you, and as required or permitted by law.

### Your Right to Know

Pursuant to the Californian Consumer Privacy Act ("CCPA"), you have the right to know of the categories of personal information we collect, and the purposes for which the categories of personal information are used. You also have a right to know of the categories of personal information that we have disclosed about you to another party for a business purpose.

#### Your Right to Access

As a California resident, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your <u>Verifiable Consumer Request</u>, we will disclose to you: • the categories of personal information we collected about you; • the categories of sources for the personal information; • the categories of third parties with which we share personal information; and • the specific pieces of personal information we collected about you (also called a data portability request).

### **Deletion Request Rights**

As a California resident, 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 <u>Verifiable Consumer Request</u>, we will delete your personal information from our records, unless an exception applies.

### Your Right to Opt Out

California law requires businesses that sell personal information to third parties to provide consumers with the right to opt-out of that business selling their personal information to third parties. We do not sell personal information to third parties.

#### Your Right to Non-Discrimination

We do not discriminate against you for exercising any of your CCPA rights. Unless otherwise permitted by California law, we will not: • deny you goods or services for which you are eligible; • 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; and • suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We do not currently provide any financial incentives to consumers.

#### Verifiable Consumer Requests

If you would like to request additional information on the personal information, we collect about you or if you would like to request that we delete all applicable personal information about you, please submit a Verifiable Consumer Request through one of the following channels: • calling Century Automotive Service Corporation at 888-338-0389 extension 77199; • email a Request at: <u>consumerprivacyinfo@centuryservicecorp.com</u>; or • writing to Century Automotive Service Corporation, P.O. Box 3809, Albuquerque, NM 87180-0389.

Under California law we are required to verify your identity before granting your right to access or delete personal information about you. 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 only make a verifiable consumer request for access of data portability twice within a twelve (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; and • describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it. We do not charge a fee for this process unless a request is deemed excessive, repetitive, or manifestly unfounded. WE CANNOT RESPOND TO YOUR REQUEST OR PROVIDE YOU WITH PERSONAL INFORMATION IF WE ARE UNABLE TO VERIFY YOUR IDENTITY OR AUTHORITY TO MAKE THE REQUEST AND CONFIRM THE PERSONAL INFORMATION RELATES TO YOU.

#### Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this notice, we will post the updated notice on this website page and update the notice's effective date.

## IF YOU HAVE ANY DIFFICULTY READING THIS NOTICE, YOU MAY CALL US TOLL FREE AT 888-338-0389 extension 77199 SO WE MAY ASSIST YOU.

## CCPA EFFECTIVE DATE: January 1, 2020 PRIVACY STATEMENT LAST REVISED DATE: March 1, 2021