

California Consumer Privacy Act Disclosure and Notice at Collection for Residents of California

Effective: September 4, 2025

If you are a resident of California, the additional privacy notice set forth in this California Consumer Privacy Act Disclosure and Notice at Collection for Residents of California ("Disclosure") is applicable to you pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (collectively, the "CCPA"). This Disclosure explains what Personal Information (as defined below) LeaseDirect ("LeaseDirect", "we", "us", or "our") collects, where we collect it from, what we use it for, and who we disclose it to, how long we keep it, the rights California residents may have, and how to exercise them.

Please note that the CCPA, and this Disclosure, do not apply to information covered by other federal and state privacy laws, including the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act and certain other laws.

1. Collection, Use, and Disclosure of Personal Information

"Personal Information" is any information directly or indirectly relating to an individual or household, or any information that can be used to identify an individual or household. Personal Information is "processed" when any activity is undertaken on your Personal Information, such as collection, storage, access, use, transfer, disclosure, and deletion.

Categories of Personal Information

In the past 12 months, we have collected the following categories of Personal Information, including Sensitive Personal information from you:

- *Personal Identifier and Contact Information*—such as your name, business name, postal address, telephone number, (business) e-mail address, copy of ID, date of birth, business tax identification number (EIN), federal or state identification number (including social security number, driver's license number, passport number), copy of proof of residency, account name, online identifier, device identifier, or IP address.
- *Biometric Information*—such as face image, video, and voice recordings.
- *Characteristics of Protected Classification*—such as date of birth/age, gender, military or veteran status, marital status, national origin, nationality, citizenship, race, or ethnicity.
- *Contract/agreement and financial information*—such as contract number, contract duration, information concerning your financial situation, payment history, bank account details, credit risk profile, information related to our products or services and the process of obtaining financial services.
- *Background Information*—such as Personal Information that are processed in the external and internal referral registers of Rabobank, credit reference agencies, in national and international sanctions lists to ensure your and our security, to prevent and investigate fraud, and to prevent money laundering and financing of terrorism.
- *Communications, recording, and images*—such as information concerning our conversations via telephone or in online chat sessions, video recordings, inbound and outbound e-mail communications, and camera images that we record in our offices.
- *Website and online application use information*—such as cookies or similar tracking technologies that may collect your IP address, data about the applications and devices you use to visit our website and online applications, browsing and search history, interaction with our websites, advertisements, user login and access information, or language preference in the context of using our services.
- *Inferences*—such as inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics.
- *Information about commercial or consumer needs*—such as information about business needs and operational information, records of personal property, product or services purchased,

obtained, or considered, payment history, or other purchasing or consumer histories or tendencies.

- *Sensitive Personal Information*—such as social security numbers, driver's license numbers, passport numbers, account log-in names and passwords, geolocation data of equipment we finance, gender, country of birth, citizenship, national origin, nationality, proof of residency, race, ethnicity, marital status, military status, criminal record, contents of mail, email or a text message, certain biometric information such as video, picture, or voice recording for the purpose of identifying an individual.
- *Professional or Employment Related Information, if you are a LeaseDirect employee, director, contractor, intern, or job applicant, as applicable*—such as job title, office location, work preference, business activities, performance evaluations, leave related data, and work-related communications or contacts, pre-employment screenings, resume, employment background, educational background including GPAs, family details, emergency contact, information available on your job board/social networking accounts, data generated by your participation in behavioral/cognitive assessments, training records, tax information, bank account information, payroll information, health benefits, financial account information, data required to meet legal obligations (e.g., child support, workers' compensation, unemployment claims, and similar matters), data on business-leased vehicle use and personal vehicle information when parked at LeaseDirect office locations.

Categories of Sources of Personal Information

In the past 12 months we have collected Personal Information about California residents from the following categories of sources:

- You directly, or other authorized parties acting on your behalf, through physical (e.g., paper application, visitor registration when you visit our office), audio (e.g., phone), visual (e.g., Closed Circuit Television monitoring when you visit our offices), or electronic (e.g., website, social media) sources.
- Public records made available by federal, state, or local government entities or widely available sources made available by media.
- Third parties that provide data to support our business and operational activities such as our Affiliates, joint venture partners, business partners, manufacturers, vendors, dealers, distributors of goods or services you finance with us, credit bureaus, and suppliers who provide goods and services to us.
- Equipment you finance with us.
- From our job application websites, job board, social networking accounts if you are a LeaseDirect employee, director, contractor, intern, or job applicant.

Business and Commercial Purposes for the Collection, Disclosure, and Use of Personal Information

We collect, use, disclose, or process Personal Information of California residents for the following business and/or commercial:

- Contractual necessity to provide you with products and services.
- Promotion and/or marketing to provide potential products and services that may be of interest to you.
- Support business operations, including to meet risk, legal, and compliance requirements.
- Improve our products and services.
- Support employment, human resources, and operational management. This includes facilitating recruitment and onboarding, administering payroll and benefits, managing performance and training, responding during an emergency, ensuring workplace safety and compliance, supporting legal and regulatory obligations, enabling business continuity and strategic planning, and providing you with access to facilities, systems, assets and other LeaseDirect resources.

LeaseDirect may use, process, or disclose Sensitive Personal Information of California residents we collect for one or more of the following purposes:

- To perform or provide the services reasonably expected by you;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and/or confidentiality of Personal Information;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with LeaseDirect;
- For third parties to perform services on behalf of LeaseDirect;
- To verify or maintain the quality or safety of services or devices that are owned or controlled by LeaseDirect, and to improve, upgrade, or enhance the services or devices that are owned or controlled by LeaseDirect;
- To collect or process Sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about you; and/or
- For any other acceptable purposes as set forth in the CCPA.

Disclosure of Personal Information

- You and, where appropriate, your representatives
- Our affiliates
- Business Partners and Service Providers
- Advertisers and/or Marketing Agencies
- Legal advisors, government authorities, regulators or supervisor authorities and law enforcement agencies
- Third parties in the event of a sale, merger, or transfer of our company's equity or assets or in the unlikely event of a bankruptcy, liquidation, or receivership of our business

2. Retention of Personal Information

We have a retention policy which specifies how long we store data. We endeavor to retain each category of your Personal Information for no longer than what is reasonably necessary for business purposes according to our internal retention policy. We use the following criteria to determine the applicable retention period(s):

- whether there is a retention period required by applicable laws or regulations;
- pendency of any actual or threatened litigation for which we are required to preserve the information;
- pendency of applicable statutes of limitations for potential legal claims; and
- business needs or generally accepted best practices in our industry

When we determine that it is no longer reasonably necessary to retain your Personal Information for disclosed business purpose(s) based on the above criteria, we will endeavor to delete or de-identify your Personal Information.

We have implemented appropriate technical and organizational measures to ensure that only people that have a right or need to know your information can access it.

3. Your Rights and Choices

1. **Right to Know and Portability:** You may request that we disclose to you the following information covering the 12-month period prior to your request if you submit a Verifiable Request (as defined in Section 5, below) (such request, an "Access Request"):
 - a. The categories of Personal Information collected about you.
 - b. The categories of sources from which your Personal Information was collected.
 - c. The purpose for collecting or disclosing your Personal Information.

- d. The categories of third parties to whom Personal Information is disclosed about you, and the categories of Personal Information disclosed.
 - e. The specific pieces of Personal Information collected about you.
 - f. If we disclosed your Personal Information for a business purpose, what categories of Personal Information we disclosed for a business purpose, and to which categories of recipients we disclosed it to.
 - g. You may request a copy of your Personal Information, and/or request that we transmit your Personal Information to another entity. To the extent technically feasible, we will comply with your request and provide and/or transmit your Personal Information in a structured, commonly used, and machine-readable format.
2. **Right to Delete:** You may request that we delete certain Personal Information collected about you by submitting a Verifiable Request ("Deletion Request"). We may deny your Deletion Request if retaining your Personal Information is necessary for us or our service providers to:
- a. Complete the transaction for which we collected your Personal Information, provide goods or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
 - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
 - c. Debug products to identify and repair errors that impair existing intended functionality;
 - d. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
 - e. Make other internal and lawful uses of that information that are compatible with the context in which you provided it; and
 - f. Comply with legal obligations, laws, and regulations, including other denial grounds provided under CCPA.
3. **Right to Correct.** You have the right to request that we correct any of your Personal Information that is inaccurate by submitting a Verifiable Request. We will correct any inaccurate Personal Information pursuant to your request to the extent possible using commercially reasonable efforts. We may deny your correction request if the Personal Information is accurate.
4. **Right Not to Receive Discriminatory Treatment:** You have the right to be free from discrimination by LeaseDirect for exercising your rights under the CCPA.

For purposes of this section and under CCPA, "**Sell**," "**Selling**," "**Sale**," or "**Sold**," means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to another business or a third party for monetary or other valuable consideration.

For purposes of this section and under CCPA, "**Share**," "**Shared**," or "**Sharing**" means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to a third party for Cross-context Behavioral Advertising, whether or not for monetary or other valuable consideration.

We do not Sell or Share, as such terms are defined above, your Personal Information.

We do not offer the right to limit our use and disclosure of Sensitive Personal Information because we do not use or disclose Sensitive Personal Information in such a manner as to require provision of the right.

Individuals Under 16 Years of Age

We do not knowingly collect, Sell or Share Personal Information from children under 16 without parental consent.

4. How can you contact us with a request, question, or complaint?



We would like to hear from you if you have any questions about this Disclosure, or if you wish to exercise any of your rights.

For questions related to this Disclosure, please contact our local privacy officer or local compliance officer via email at USprivacyoffice@leasedirect.com. You can also reach our customer support toll-free at 1(800) 736-0220.

If you would like to exercise any of your rights or have any concerns, please do so by completing this form:

[Submit a Request or Complaint](#)

5. LeaseDirect's Verification Process

When you make a request regarding your Personal Information, we will ask you to provide the following information to verify your identity ("Verifiable Request"):

- Name, address, phone number, date of birth, email address; and, in certain situations as may be required to confirm your identity, the last 4 digitals of your social security number or individual taxpayer identification number, and/or a copy of government issued photo ID.

If you are making a request as an authorized agent for a California resident, we may request that you provide, as applicable:

- Your name, address, phone number, date of birth, email address; and, in certain situations as may be required to confirm your identity, a copy of government issued photo ID.
- The California resident's name, address, phone number, date of birth, email address, last 4 digits of social security number or individual taxpayer identification number; and, in certain situations as may be required to confirm the identity of the individual on whose behalf the request is being made, a copy of a government issued photo ID.
- A document to confirm that you are authorized to make the request on the California resident's behalf. We accept as applicable: a copy of a power of attorney, legal guardianship, conservatorship order, or the California resident's signed permission demonstrating that you are authorized to act on such California resident's behalf.

In addition, if you are a company or organization ("Authorized Entity") making a request as an agent on behalf of a California resident:

- Authorized Entity's active registration with the California Secretary of State.
- From the individual who is acting on behalf of the Authorized Entity, proof that the individual is authorized to make the request. We accept a letter on the Authorized Entity's letterhead, signed by an officer of the Authorized Entity.

6. Will we update this Disclosure?



Last updated on September 4, 2025

This Disclosure will be updated from time to time in case of additional legal requirements or if we process Personal Information differently. The changes we made to the Disclosure will become effective upon posting as of the last updated date as shown above. This is the most up-to-date version.