

rev. March 2024

## **Overview of Online Privacy Policy**

First Investors Financial Services, Inc. and First Investors Servicing Corporation (“First Investors”) understands that you may be concerned about your online privacy. Therefore, we want to make you aware of our online privacy policy for all of our web sites. This Online Privacy Policy describes the information we collect from and about you during your visit to our web sites and how we use information about you, with whom we share it and how we protect it. This Online Privacy Policy applies only to First Investors web sites. Our web sites may contain links to third party sites not controlled by First Investors or covered by this Online Privacy Policy. By including a link to a third-party web site, First Investors does not endorse or recommend any products or services offered or information contained at the third-party web site. We recommend that you check the privacy statements of other sites you visit before providing any personal information. Such third party may have a privacy policy different from that of First Investors and the third-party web site may provide less security protection than our web sites. If you decide to visit a third-party web site via a link contained on our web sites, you do so at your risk.

If you become a customer of First Investors, and once a year while you remain a customer of First Investors, we will provide you with a Privacy Notice describing our overall privacy practices. It will describe and provide any updates to the collection and sharing of personal information about our customers, as required by law. This Online Privacy Policy pertains to our web sites.

### **What personal information does First Investors collect online?**

We collect personally identifiable information (“PII”) about you from the information you provide to us when you visit our web sites. The information we collect will depend on the web site you visit. This information may include, but is not limited to:

- Identifiers including real name and aliases, if any;
- Residential address;
- Mailing address;
- Date of birth;
- Telephone numbers (home, mobile and work);
- E-mail addresses;
- Driver’s license number;
- Passport number;
- Government issued identifiers, including Social Security number and state identification card number;
- Account transaction information and history;
- Account number at a bank or other financial institution, type of bank account and the name of bank or other financial institution;
- Payment information including debit card, credit card or checking account numbers and routing information;
- Unique personal identifier;
- Online identifier;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Internet or network activity information, such as browsing history and interactions with our website;
- Account name;

- Signature;
- Insurance policy information including policy number;
- Professional or employment-related information, such as work history, prior employer and current employer;
- Motor vehicle information, including vehicle identification number;
- Audio, electronic, visual and similar information, such as telephone call recordings;
- E-mail communications;
- Text messages;
- Education information;
- Income information;
- Information concerning references;
- Information contained in credit reports;
- Characteristics of protected classifications under California or federal law, such as sex and marital status; and
- Inferences drawn from any of the personal information listed above to create a profile about, for example, an individual's preferences and characteristics.

### **How does First Investors use the PII it collects online?**

We use PII collected online for various functions, which may include:

- to respond to your inquiries and fulfill your requests;
- facilitating your participation in online activities;
- auditing related to our current interactions with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- debugging to identify and repair errors that impair existing intended functionality;
- short-term, transient uses, but your personal information will not be disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- undertaking internal research for technological development and demonstration;
- undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance our services or devices;
- any commercial purposes, including any purpose to advance your commercial or economic interests, such as by inducing you to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction; and
- complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)

For example, we may use the information you provide when you complete an online application for credit in order to process and evaluate your application. We may also use the information you provide to contact you regarding your account and to process or collect payments. In addition, we may collect and use information for analytic purposes, market research or for marketing purposes, as allowed by law.

We collect the above categories of PII from the following sources:

- Directly from you or your authorized agents and parties (*e.g.*, from documents that you provide to us related to the services for which you engage us, including, but not limited to credit applications, or through information we collect from you including your employer, in the course of providing services to you);
- Directly and indirectly from your activity on our digital properties (*e.g.*, from submissions through our website portal or website details we collect automatically); and
- From third parties that interact with us in connection with the services we perform (*e.g.*, from credit bureaus).

### **Does First Investors share the PII it collects online?**

We may share the PII we collect about you with third parties, such as companies performing services on our behalf to provide the products or services you have requested. As permitted by law, we may also share information collected about you with companies with whom we have formal agreements to offer you financial products and services, such as payment processing of a debit card, credit card or ACH payment. We may share information about you with our affiliates and with nonaffiliates for analysis, market research and marketing purposes as allowed by law and consistent with the above Overall Privacy Notice and the California Privacy Notice. Finally, we may disclose your PII as otherwise permitted or required by law, such as to government or regulatory authorities.

We do not sell PII, and we will not sell PII except as described in this Online Privacy Policy or if we provide you with notice and a right to opt-out of such sale.

### **Does First Investors track users by using cookies or other online technologies to collect information?**

When you browse or visit one of our web sites, we may store certain information on your computer. This information may be in the form of a small text file called a “cookie” and can help us to tailor our sites to your individual preferences and save you time if you visit the site again. Cookies are text files containing small amounts of information which are downloaded to your device when you visit a web site. Cookies are useful in a number of ways, including allowing a web site that you use to recognize your device, keep track of pages visited and even remember your preferences. Cookies can expire at the end of a browser session (these are called “session” cookies) or they can be stored longer (these are called “persistent” cookies). You can disable cookies by making the appropriate selection from your browser options to inform you when cookies are set or to prevent cookies from being set. However, if you choose to disable or delete cookies, you may limit the functionality we can provide when you visit our site. We may use online tracking technologies, such as cookies, to gather anonymous, aggregate information about your visit to our web sites. This information allows us to measure site activity and to create ideas for improving our sites and may include the time and length of your visit, the pages you look at on our sites, the web site you visited just before coming to ours and your internet service provider. If we provide you with a link from a First Investors site to another site, we may track the fact that you clicked the link. This will help us understand which links are helpful to you when you visit our site and will help us provide you with links that may be of interest to you, when you visit our site again.

We use Google Analytics, a popular web analytics service provided by Google, Inc. Google Analytics generates statistical and other information about use of our web sites by means of cookies, which are stored on visitors' computers. It counts the number of visitors and tells us things about their behavior overall – such as the typical length of stay on the site or the average number of pages a user views. The information generated relating to our web sites is used to create reports about the use of the web sites. Google will store this information. Google's privacy policy is available at: <http://www.google.com/policies/privacy/>. You can learn more about how to opt out of the collection and processing of such information by Google by visiting this website: <https://tools.google.com/dlpage/gaoptout>.

In addition, we collect the IP address of each visitor to track activity occurring on the web site, including the following examples:

- Customer Requested Password Retrieval
- Customer Requested Username Retrieval
- Customer Changed Email Address
- Customer Changed Username
- Customer Changed Secret Question
- Customer Changed Contact Info
- Visitor sent email from Contact Us form
- Customer Made a Payment
- Customer Edited a Payment
- Customer Canceled a Payment
- Customer Created AutoPay Enrollment
- Customer Updated AutoPay Enrollment
- Customer Canceled AutoPay Enrollment
- Customer Submit AutoPay Pre-Enrollment form
- Customer Submit Loan Application

Other than described above, First Investors does not use tracking cookies or other technology to track your browsing behavior and we do not permit third parties to do so. Since we do not track, we do not sell your browsing information to third parties to advertise to you. We do not respond to “do not track” signals at this time.

### **How can I change or update my PII with First Investors?**

If you have questions about PII you provided on a First Investors web site or wish to update information, you may contact us as follows:

**MAIL**

First Investors Financial Services  
ATTN: Compliance Department  
3065 Akers Mill Rd, Suite 700  
Atlanta, Georgia 30339

**E-MAIL**

[privacy@fifsg.com](mailto:privacy@fifsg.com)

### **What steps does First Investors take to protect PII it collects online?**

We restrict access to the PII obtained from our web site to only those employees, agents and contractors who need it to do their jobs. We maintain administrative, technical, and physical safeguards designed to protect your PII. Companies that provide online services on our behalf are required by contract to protect customer information. They are only allowed to use the information they collect for the purpose of providing the services that we have contracted to them.

### **Does First Investors collect PII online about children?**

We do not intentionally collect or maintain data about children under 13 and our web sites are not intended for children under 13.

We do not sell the PII of California consumers, including consumers that are less than 16 years of age, unless the consumer (in the case of consumers between 13 and 16 years of age) or the consumer's parent or guardian (in the case of consumers who are less than 13 years of age) has affirmatively authorized the sale of the consumer's PII.

### **If I'm a California resident, what are my privacy rights?**

Under the California Consumer Privacy Act ("CCPA"), California residents have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
  - a. the categories of PII about you that we collected;
  - b. the categories of sources from which the PII was collected;
  - c. the business or commercial purpose for collecting PII about you;
  - d. our business or commercial purpose for disclosing the categories of PII about you;
  - e. the categories of PII that we disclosed about you for a business or commercial purpose;
  - f. the categories of third parties to whom we disclosed PII about you and the categories of PII that was disclosed (if applicable); and
  - g. the specific pieces of PII we collected about you; and certain household information.
2. Request we delete Personal Information we collected from you or your household, unless the CCPA recognizes an exception; and
3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of PII will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of PII would adversely affect the rights and freedoms of another consumer or where the PII that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account

numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

First Investors will not discriminate against you if you choose to exercise any of your rights as described in this section.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

Only you, or a person registered with the California Secretary of State whom you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. For a verifiable consumer request, you must be able to:

- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond; and
- Provide sufficient information to allow us to reasonably verify you are the California resident about whom we collected Personal Information or an authorized representative of such resident. The information you provide must include:
  - Confirmation of California residency;
  - Full name;
  - Address;
  - Email address; and
  - Other information that authenticates you (if a customer) or verifies you (if non-customer or authorized party).

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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## How to Exercise Your Rights

If you are a California resident, you may submit a request by:

1. Sending an e-mail to [privacy@fifsg.com](mailto:privacy@fifsg.com)
2. Calling 800-234-0971 (Financed Vehicles) or 800-439-0985 (Leased Vehicles)

## Questions or Concerns

You may contact us with questions or concerns about this Disclosure and our practices as follows:

**MAIL**

First Investors Financial Services  
ATTN: Compliance Department  
3065 Akers Mill Rd, Suite 700  
Atlanta, Georgia 30339

**E-MAIL**

[privacy@fifsg.com](mailto:privacy@fifsg.com)

**Will First Investors make changes to this online privacy policy?**

This Online Privacy Policy is effective as of March 8, 2024. Unless otherwise stated, any future modifications to this Online Privacy Policy will go into immediate effect after they have been posted, as indicated by the Last Updated date at the beginning of this Online Privacy Policy. We reserve the right to alter this Online Privacy Policy at our discretion. Any change to this Online Privacy Policy will be posted on our web sites in a timely manner.