

## **Privacy Policy and Notice at Collection for California Residents**

Last Updated: January 15, 2025

This CCPA Privacy Policy and Notice at Collection for California Residents (the “Privacy Policy”) applies to NFS Leasing, Inc. and its affiliates and subsidiaries (collectively, “NFS Leasing,” “we,” “us,” or “our”) processing of personal information of California residents to the extent the information is subject to the California Consumer Privacy Act of 2018 as amended, including by the California Privacy Rights Act of 2020 (“CCPA”). For example, this Privacy Policy does not apply to personal information collected pursuant to various exemptions including for (i) medical and health information covered by HIPAA, and (ii) de-identified or publicly available information.

### **Personal Information We Collect, Use, Disclose, Share, or Sell**

*Categories of Personal Information We Collect, Categories of Sources of Personal Information, Business or Commercial Purposes for Which Personal Information Will Be Used, and Third Parties with Whom Personal Information is Sold, Shared, or Disclosed.*

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The chart below includes information collected for various types of individuals, such as our customers, employees, and others. As a result, not all of the categories of collected personal information described below may be applicable to you. Within the last twelve (12) months and on an ongoing basis, we may have collected and plan to collect the following categories of personal information from the sources identified below for the business and commercial purposes indicated, and disclosed, shared, or sold (as indicated) such categories of personal information with the specified categories of third parties.

| Category of Personal Information | Examples of Personal Information Collected  | Categories of Sources of Personal Information Collected  | Business or Commercial Purpose(s) for Which Collected, Disclosed, or Shared.  | Categories of Third Parties to Which Personal Information is Disclosed, or Shared.   |
|----------------------------------|---|--|---|--|
| Identifiers                      | A real name, alias, postal address, unique personal identifier, social security number, driver's license number, online identifier, passport number, Internet Protocol address, email address, account name or other similar identifiers. | <p>Directly from you, for example when you apply to work for us or in your role as our personnel, when you visit our offices, or as a customer when you fill out and submit our forms, or through browser cookies set when you visit the Site.</p> <p>From third-parties, such as your employer, through social media services consistent with your settings on such devices, or from third-party sources that are lawfully entitled to share your data with us.</p> | <p>We use this personal information to support our business operations and human resource functions. For example:</p> <ul style="list-style-type: none"> <li>• Providing you with the services that you request;</li> <li>• Marketing and promoting our services.</li> <li>• Servicing our relationship with you.</li> <li>• Engaging in commercial and corporate transactions, including due diligence;</li> <li>• Payroll and other human resources functions.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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|--|---|--|--|--|
| <p>Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e))</p> | <p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, educational background, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> | <p>Directly from you, for example when you apply to work for us or in your duties as our personnel, when you visit our offices, or as a customer when you fill out and submit our forms, or through browser cookies set when you visit the Site.</p> | <p>We use this personal information to support our business operations and human resource functions. For example:</p> <ul style="list-style-type: none"> <li>• To enable your use of our services.</li> <li>• To communicate with you about the availability of our services.</li> <li>• For testing, research, analytics and product and service development.</li> <li>• To engage in marketing and advertising activities.</li> <li>• To carry out our obligations and enforce our rights including those arising from any contracts entered into between you and us, including for billing, payment, and collections.</li> <li>• To send you information we believe may interest you.</li> <li>• For business activities such as contract management, vendor engagement, IT and website administration and security, fulfillment, analytics, corporate governance, and legal compliance.</li> <li>• To inform you of employment opportunities and consider your qualifications.</li> <li>• To protect the rights, property, security, and safety of us, our employees, our consumers, our information systems, and the public.</li> <li>• To comply with legal and statutory requirements, or</li> <li>• For public safety purposes, including to respond to law enforcement requests and detect and prevent fraud and other crimes.</li> <li>• 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.</li> </ul> | <p>Vendors and other industry service providers;<br/> Government agencies including to support regulatory and legal requirements;<br/> Outside companies or organizations, in connection with routine or required reporting; and<br/> affiliates and subsidiaries.</p> |
|--|---|--|--|--|

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|---|--|--|--|--|
| <p>Characteristics of protected classifications under California or federal law</p> | <p>Age, national origin, religion, citizenship or immigration status, marital status, physical or mental disability, genetic information or ancestry, sex, veteran or military status.</p> | <p>Directly from you, for example when you apply to work for us or in your duties as our personnel, when you visit our offices, or as a customer when you fill out and submit our forms, or through browser cookies set when you visit the Site.</p> <p>From third-parties, such as your employer, through social media services consistent with your settings on such devices, or from third-party sources that are lawfully entitled to share your data with us.</p> |  | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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|----------------------------------|---|--|---|--|
| Commercial Information           | <p>Records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>Location and identification of property related to our services offered (for example, property address, vehicle license plate or identification number), information about your commercial or business history.</p> | <p>Directly from you, for example when you apply to work for us or in your duties as our personnel, when you visit our offices, or as a customer when you fill out and submit our forms, or through browser cookies set when you visit the Site.</p> <p>From third-parties, such as your employer, through social media services consistent with your settings on such devices, or from third-party sources that are lawfully entitled to share your data with us.</p> | <ul style="list-style-type: none"> <li>• Providing you with products and services you request.</li> <li>• Providing you with information about our products or services that may be of interest to you.</li> <li>• Developing additional products or services.</li> <li>• Communicating with you, for example to respond to inquiries.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |
| Biometric Information            | <i>We do not collect this category of information.</i>  |  |   |  |

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|---|---|---|--|--|
| Internet or other electronic network activity information | <p>Browsing history, search history, and a consumer's interaction with an Internet website, application, or advertisement.</p> <p>Network traffic and other electronic or internet activity performed when acting as our personnel through our systems.</p> | <p>As the result of your use of our online services, such as our website, consumer portals or mobile applications (if any), including through the use of cookies, embedded content, and other recognition and/or tracking technologies.</p> <p>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third-parties that interact with us, such as your employer, through social media services consistent with your settings on such devices, or from third-party sources that are lawfully entitled to share your data with us.</p> | <ul style="list-style-type: none"> <li>• Provide access to our website and the information about our products and services,</li> <li>• Securing our website and information systems.</li> <li>• Providing you with information, including communications about products and services that may be of interest to you.</li> <li>• Supporting, personalizing, and improving our website, products and services.</li> <li>• Facilitating personnel's use of our information systems.</li> <li>• Protecting our information systems and other property from harm or damage.</li> <li>• Securing our information systems against attacks or misuse.</li> <li>• Verifying compliance with our policies, procedures, and workplace rules.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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|--------------------------------------|--|--|--|---|
| Geolocation data                     | Geographic tracking data, physical location and movements. | <p>Directly from you, when using our services, applications, and information systems.</p> <p>From third-parties that interact with us in connection with the products and/or services that we provide.</p>   | <ul style="list-style-type: none"> <li>• Providing you with products and services you request.</li> <li>• Facilitating services related to remote worksite management,</li> <li>• Tracking our information assets.</li> </ul>  | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>and affiliates and subsidiaries.</p> |
| Audio, visual or similar information | Telephone or video calls or recordings.                    | <p>Directly from you, for example recordings of calls to call centers and customer calls, and video recordings when you visit our facilities.</p> <p>From third-parties that interact with us in connection with the products and/or services that we provide.</p> | <ul style="list-style-type: none"> <li>• Providing you with products and services you request.</li> <li>• Providing you with information about our products or services that may be of interest to you.</li> <li>• Human resources functions.</li> <li>• Providing security for our personnel and facilities.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and affiliates and subsidiaries.</p>        |

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|--|--|---|--|--|
| Professional or employment-related information | <p>Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply to work with us.</p> <p>Current and/or past employment history, payroll records, benefits records, leave documentation, or medical records.</p> | <p>Directly from you, for example when you apply to work for us or in your duties as our personnel, when you visit our offices, or as a customer when you fill out and submit our forms, or through browser cookies set when you visit the Site.</p> <p>From third-parties that interact with us in relation to hiring or human resources operations.</p> | <ul style="list-style-type: none"> <li>• Providing you products and services you request.</li> <li>• Evaluating job applicants' suitability for job openings.</li> <li>• Making decisions about promotion and determinations about seniority.</li> <li>• Supervising personnel and their performance.</li> <li>• Hiring and other human resources functions.</li> <li>• Verifying personnel's licenses or certifications.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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| <p>Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. 1232g, 34 C.F.R. Part 99))</p> | <p>Student records and directory information.</p> | <p>Directly from you, for example when you apply to work for us or in your role as our personnel, or as a customer when you fill out and submit our forms.</p> <p>From third-parties that interact with us in relation to hiring or human resources activities.</p> | <ul style="list-style-type: none"> <li>• Providing you with products and services you request.</li> <li>• Hiring and other human resources functions.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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|--|---|--|--|--|
| Inferences drawn from other personal information | A person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes. | Directly from you, for example when you apply to work for us or in your role as our personnel, or as a customer when you fill out and submit our forms. From third-parties, such as your employer, through social media services consistent with your settings on such devices, or from third-party sources that are lawfully entitled to share your data with us. | <ul style="list-style-type: none"> <li>• Supporting, personalizing, and improving our website, products or services.</li> <li>• Hiring and other human resources functions.</li> </ul> | <p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements;</p> <p>Outside companies or organizations, in connection with routine or required reporting; and</p> <p>affiliates and subsidiaries.</p> |

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| Sensitive Personal Information   | Personal information that reveals: a Social Security number or other government identifier; account login information or a financial account number with associated credentials; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email, or text messages not intended to be received by us; genetic data. Or any of the following: health information; information that concerns a consumer's sexual orientation or sex life. | Employees and job applicants who seek employment. Users who disclose information directly to us to receive our services. | <ul style="list-style-type: none"> <li>• Providing you with products and services you request.</li> <li>• Providing you with information about our products or services that may be of interest to you.</li> <li>• Hiring and other human resources functions.</li> </ul> | Vendors and other industry service providers; Government agencies including to support regulatory and legal requirements; Outside companies or organizations, in connection with routine or required reporting; and affiliates and subsidiaries. |

## **Information about our Personal Information Processing Activities**

Additional details of how we process personal information is set forth in the chart above.

Personal Information is retained based on internal retention policies. Information is segregated by legal retention requirements and maintained in accordance with various local, state, federal, and other legal requirements. Personal information will not be retained beyond the reasonably foreseen need to retain the information for legal or business purposes.

We do not sell consumers' personal information.

We may share personal information (for purposes of cross-context behavioral advertising).

We do not sell or share (for purposes of cross-context behavioral advertising) the personal information of minors under 16 years of age.

We share cookies with third parties as described in our online privacy policy. To opt-out of the sharing of information with third parties in this context, please review our online privacy policy for instructions or adjust your browser settings accordingly.

We do not use or disclose sensitive personal information for purposes other than the following:

- (1) To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- (2) To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information,
- (3) To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- (4) To ensure the physical safety of natural persons.
- (5) 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 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.
- (6) To perform services on behalf of the business.

(7) To verify or maintain the quality or safety of a product, 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 by, manufactured for, or controlled by the business.

(8) To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

## **Your Privacy Rights**

### *Submitting Consumer Requests*

You may submit a consumer request to us by email at [info@nfsleasing.com](mailto:info@nfsleasing.com), or by phone at 866-970-4637 (toll free) to make a consumer request. You may make up to two disclosure requests in any 12 month period. Please review the consumer request forms below.

Only you, or someone legally authorized 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.

Making a verifiable consumer request does not require you to create an account with us.

When you submit a verifiable consumer request, we will take steps to verify your request by email or telephone call. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

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

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.

### *Right to Know and Access Your Information*

You have the right to request that we disclose to you certain descriptions and categories of the personal information we collect, use, disclose, share, or sell about you. For example, you may request the following through a consumer request:

- (1) The categories of personal information we have collected about you.
- (2) The categories of sources from which the personal information is collected.

- (3) The business or commercial purpose for collecting, selling, or sharing personal information.
- (4) The categories of third parties to whom we disclose the personal information.
- (5) The specific pieces of personal information we have collected about you.

You may make up to two disclosure requests in any 12 month period. See above for additional details on making a consumer request.

#### *Right to Request Deletion*

You have the right to request that we delete your personal information. See above for additional details about how to submit a consumer request.

You should be aware, however, that California law allows us to retain your personal information under certain conditions, even if you have asked us to delete it, such as when retaining your personal information is necessary for us to complete a transaction with you or provide you with a good or service you have requested. We will notify you of any denial of your deletion request and the reason for such denial.

#### *Right to Request Correction*

You have the right to request that we correct your personal information. See above for additional details about how to submit a consumer request.

#### *Right to Non-Discrimination for Exercise of Consumer Privacy Rights*

We will not discriminate against you because you have chosen to exercise any of your privacy rights provided by the CCPA.

#### *Right to Opt-Out of the Sharing or Sale of Personal Information*

We may share personal information we collect about you with third parties for purposes of cross-context behavioral advertising. We do not sell personal information we collect about you, as the term “Sale” is defined by the CCPA. You may opt out of the sharing (for purposes of cross-context behavioral advertising) of your personal information by signaling an opt-out preference by making an opt-out request.

To submit a request under the Right to Opt-Out, please provide the information necessary to identify the consumer to whom the request should be applied and reasonable identifying information that you are authorized to make the request and submit an email requesting your “Right to Opt-Out” to [info@nfsleasing.com](mailto:info@nfsleasing.com), or by phone at 866-970-4637 (toll free).

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sharing or sale at any time by contacting us.

Authorized agents will be required to provide proof of their authorization to submit opt-out requests and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent in limited circumstances.

*Right to Non-Discrimination for Exercise of Consumer Privacy Rights*

We will not discriminate against you because you have chosen to exercise any of your privacy rights provided by the CCPA.

**Using an Authorized Agent**

You may use an authorized agent to submit a consumer request. To use an authorized agent, you will need to (i) provide written instruction to your agent, and verify your identity to us, or (ii) provide a power of attorney pursuant to California Probate Code Sections 4000 to 4465.

**Contact Us**

Please read this Policy carefully to understand our practices regarding how we process CCPA personal information. If you should have any questions regarding this Privacy Policy please contact us below.

If you would like to contact us with a general question, please contact us at [info@nfsleasing.com](mailto:info@nfsleasing.com) or write to us at NFS Leasing, 900 Cummings Center Suite 226-U, Beverly, MA 01915 or by telephone at 866-970-4637.