

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE



Last Updated Date: December 17, 2019 Effective Date: January 1, 2020

Changes to Our California Privacy Notice

indi will update this notice in response to changing legal, technology, or business developments. We will post the most up-to-date notice on <https://goindi.com/agreements/california-privacy-notice>. You can see when the notice was last updated by checking the “last updated” date displayed at the top. If you have questions about changes, please contact indi by following the details below.

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1 INTRODUCTION

1.1 This policy applies to the indi product (“indi”), a product provided by numo LLC (“numo”) and PNC Bank, N.A. (“PNC”) (collectively, “we,” “us,” or “our”). We are committed to protecting the privacy of personal information of individuals. This Privacy Notice supplements the information contained in the Privacy Policy of indi and applies solely to residents of the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended. Any terms defined in the CCPA have the same meaning when we use them in this notice.

2 INFORMATION WE COLLECT

2.1 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”). Section 2.3 provides information about certain types of data that are not considered personal information. In particular, we have collected the following categories of personal information listed in Section 2.2 from our consumers within the last twelve (12) months.

2.2 Personal information is collected from the following categories of information; however, not all examples listed in the table below are collected from every consumer.

Category	Examples*
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security Number, driver’s license number, passport number, or other similar identifiers
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	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, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)

D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement
G. Geolocation data	Physical location or movements
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information
I. Professional or employment-related information	Current or past job history or performance evaluations
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Not collected
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

*We may not collect all items listed as examples in a particular category.

2.3 Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

2.4 We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you or your authorized agents — for example, from documents that our customers provide to us related to the services for which they engage us.
- Indirectly from you or your authorized parties — for example, through information we collect from our customers (including your employer) in the course of providing services to them.
- Directly and indirectly from activity with our services — for example, from submissions through our mobile application or website, or mobile application or website usage details we collect automatically.
- From third parties that interact with us in connection with the services we perform — for example, from services that help us verify your identity.

3 USE OF PERSONAL INFORMATION

3.1 We may use or disclose the personal information we collect about California consumers for one or more of the following business purposes:

- To fulfill or meet the reason for which the information was provided. For example, if you, your employer, or another entity with whom we do business, shares your name and contact information to request a financial product or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your request.
- To provide, support, personalize, and develop our websites, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content, and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our business websites, products and services, databases and other technology assets.
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, 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 a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred.

3.2 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.

4 SHARING PERSONAL INFORMATION

4.1 We may disclose your personal information to a third party 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 performing the contract.

4.2 In the preceding twelve (12) months, we may have disclosed the following categories of personal information to third parties for a business purpose (see the table above for further descriptions of the categories):

Category A:	Identifiers
Category B:	California Customer Records personal information categories
Category C:	Protected classification characteristics under California or federal law
Category D:	Commercial information
Category E:	Biometric information
Category F:	Internet or other similar network activity
Category G:	Geolocation data
Category H:	Sensory data
Category I:	Professional or employment-related information
Category K:	Inferences drawn from other personal information

4.3 We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates and subsidiaries
- Service providers
- Third parties to whom you authorize us, directly or indirectly, to disclose your personal information in connection with products or services we provide to you
- Government or regulatory authorities

4.4 In the preceding twelve (12) months, we have not sold any personal information.

5 YOUR RIGHTS AND CHOICES

5.1 The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

5.2 Access to Specific Information and a Copy of Personal Information

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 12 months and to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months (collectively, referred to as your “access” right). 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 with whom we have shared or share that personal information.
- The categories of personal information we disclosed or shared with a third party for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request).
- The categories of third parties to whom the residents’ personal information has been sold and the specific categories of personal information sold to each category of third party (if applicable).

5.3 Deletion Request Rights

You have the right to request we delete any of your personal information 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.

We may deny your deletion request if an exception applies, such as regulatory obligations or required for servicing the account.

5.4 Do-Not-Sell Rights

California residents also have the right to opt-out of the sale of their personal information by us. As noted above, we do not sell personal information about California residents.

5.5 Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request (as described more fully below) to us by either:

- Calling 833-285-1736 (voice) or 866-317-9343 (TTY).
- Emailing support@goindi.com.

Only you, or a person registered with the California Secretary of State who 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.

You may only make a verifiable consumer request for access or data portability 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.

However, 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 that 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.

5.6 Response Timing and Format

We endeavor to respond to a verifiable consumer request for access to personal information within 45 days of receiving it. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

The response we provide will also explain the reasons we cannot comply with a request, if applicable.

5.7 Non-Discrimination

California consumers have the right to exercise their access, deletion and other rights without discrimination, and to receive transparent disclosures about any incentives a business offers them with regard to the collection, use and disclosure of their personal information.

Discrimination may exist where a business takes or suggests that it will take the following actions in response to a consumer exercising rights under the CCPA, unless doing so is reasonably related to the value provided to the consumer by the consumer's data:

- Deny access to or use of goods or services.
- Charge different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide a different level or quality of goods or services.

6 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 privacy notice, we will notify you.

7 CONTACT INFORMATION

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 833-285-1736 (voice) or 866-317-9343 (TTY)
Email: support@goindi.com

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