

## IMPORTANT PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

LAST REVISED: April 1, 2020 Effective Date June 1, 2020

This privacy notice for California Consumers (“Notice”), provided by Global Holdings LLC (“Global”, “Company”, “we”, or “our”), supplements, and is expressly made part of, the information contained in Global’s online privacy policy , <https://www.ghllc.com/privacy-policy/> (hereinafter, the “Policy”) and applies solely to those who are consumers (“you” or “your”) as defined in Section 1798.140(g) of the California Consumer Privacy Act of 2018 (“CCPA”). We adopt this Notice in compliance with the CCPA and any terms defined in the CCPA have the same meaning when used in this Notice.

Global collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). As a consumer, you have certain rights regarding your personal information as defined in the CCPA. This Notice provides you with information on how Global collects, uses, and shares personal information. It also outlines the rights you have regarding personal information that we collect from you and describes how you can exercise those rights.

### Collection and Use of Personal Information

As a company that conducts activities that are financial in nature, Global is a “financial institution” as that term is defined in the Gramm-Leach-Bliley Act (“GLBA”). While the CCPA does not exempt financial institutions, and thus, Global, from its requirements, Section 1798.145(e) of the CCPA does exempt personal information collected by a financial institution pursuant to the GLBA. Accordingly, much, if not all, of the data consumers provide to Global, or that we collect from or on consumers, will fall within the GLBA exemption to the CCPA’s definition of personal information and thus outside the scope of the CCPA.

Global recognizes the eleven (11) broad categories of personal information referenced in the CCPA that a business may collect about a consumer. In particular, Global may have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol 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	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,

statute (Cal. Civ. Code § 1798.80(e)).	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. Internet or other similar network activity.	, information on a consumer's interaction with a website, application,
F. Geolocation data.	Physical location or movements.

Personal information does not include publicly available information from government records, information relating to our job applicants, employees, contractors or other personal, de-identified or aggregated consumer information, or information otherwise excluded from the CCPA's scope, such as information collected pursuant to the GLBA. For more information on our policies regarding GLBA consumer data, please see our GLBA Notice.

Notwithstanding the GLBA exemption to which most, if not all consumer information collected by Global is subject, we have obtained the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- From third parties. For example, debt settlement service providers, creditors, or other third parties.

Global may use this information to:

- Provide you with the information, products, or services you request from us.
- Fulfill the reason you provided the information, such as to respond to customer service requests or other inquiries.
- Create, maintain, customize, and secure your account with us.
- Help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.

- Process your requests, purchases, transactions, and payments.
- Provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- Prevent potentially fraudulent, prohibited or illegal activities, and enforce our Dedicated Account Agreement and Application.
- 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.

Global will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing notice to you. Such notice may be delivered, for example, by posting an updated California Privacy Notice.

### **Sharing Personal Information**

Global may disclose your personal information to a third party for business purposes. When we do so, Global enters into a contractual arrangement that describes the business purpose and requires the recipient to both: (A) keep that personal information confidential; and (B) not use it for any purpose except performing the obligations under the contract. When share your information to a third party for business purposes when you have specifically directed us to do so as a part of the services that we provide.

We share your personal information with the following categories of third parties for a business purpose:

- Debt Settlement Providers.
- Creditors.
- Service providers.
- Data aggregators and analytic providers
- Internet cookie data recipients (e.g., Google analytics)

### **Disclosure of Personal Information for a Business Purpose**

The CCPA requires Global to provide you with a statement on its personal information disclosures for a business purpose that reference the categories of information that may have been collected as reflected in the chart above. In the preceding twelve (12) months, Global may have disclosed the following categories of personal information for a business purpose:

- 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: Internet or other similar network activity.
- Category F: Geolocation data.

If we have collected or received your data in connection with a financial product or service, we may disclose information to third parties as described in our GLBA Notice <https://www.ghllc.com/glba-privacy/>.

### **Sale of Personal Information.**

The CCPA similarly requires Global to provide you with a statement on its personal information sales. In the preceding twelve (12) months, Global had not sold your personal information. Global does not and will not sell personal information of California consumers. Additionally, Global does not sell the personal information of minors under 16 years of age.

### **Notice Regarding Your Rights**

#### *Access & Data Portability Rights*

You have the right to request that Global disclose what personal information we collect, use, and disclose. If we receive and confirm your consumer request as verifiable and no exception applies, we will provide you with:

- 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 that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

As previously indicated, Global does not sell the personal information of California consumers.

#### *Deletion Request Rights*

Subject to certain exceptions, you have the right to request that we delete any of your personal information that we collected from you and retained. If we receive and confirm your consumer request as verifiable, unless an exception applies, we will delete (and direct our service providers to delete) your personal information from our records.

The CCPA provides a number of reasons why a deletion request may be denied. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### *Exercising Access, Data Portability, and Deletion Rights*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to Global by:

- Calling us toll-free during business hours at 1-877-271-1550.

Filling out the California Consumer request form available at: <https://www.ghllc.com/ccpa-privacy/> or by clicking <https://www.ghllc.com/ccpa-request-form/>

- Only you or someone registered with the California Secretary of State and legally authorized 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 or data portability twice within a 12-month period.

The verifiable consumer request must:

- Provide sufficient information that allows Global to verify, to a reasonable degree of certainty, that you are the person about whom Global collected personal information (or your authorized representative), which may include multi-factor authentication of identifying information provided by you. Such authentication may be conducted and verified independently or in combination with a comparison of personal information already maintained by Global, if any (note - an authorized representative will need to also provide written authorization from the consumer, court, attorney or other entity or individual with a fiduciary responsibility to the consumer); and
- Describe your request with sufficient detail that allows Global to properly understand, evaluate, and respond to it.

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, but we must also be able to 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.

### *Response Timing and Format*

Global endeavors to respond to a verifiable consumer request within forty-five (45) days of receiving it. If Global requires additional time to process your request, up to a maximum total of ninety (90) days from the date the request is received, we will notify you of this and inform you of the reason for requiring the additional time.

If you have an online account with us, we will deliver our written response to your online account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request or have denied a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Non-Discrimination**

Global will not discriminate against you for exercising any of your CCPA rights as described above. Unless permitted by the CCPA, Global will not:

- Deny you goods or services.
- 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.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Do Not Track Disclosures**

**How do we respond to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites or online services?**

We currently do not respond to DNT signals in browsers; the information gathered helps us improve our overall online customer experience.

**May other parties collect personally identifiable information about an individual consumer's online activities over time and across different websites when they visit [www.ghllc.com](http://www.ghllc.com)?**

No.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits certain individuals that are California residents to request information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please email us at [customersupport@ghllc.com](mailto:customersupport@ghllc.com) or write to us at 4343 S. 118th East Ave., Ste. #220, Tulsa, OK 74146.

### **Changes to Our Privacy Notice**

We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on our website and update the Notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

Global is committed to responding promptly to any questions or concerns you may have about this Notice. If you have questions concerning the methods by which Global collects or uses your personal information as explained in this Notice and our Policy, <https://www.ghllc.com/privacy-policy/> the rights granted to you under the CCPA, or how to exercise your rights, or if you are a consumer with a disability and you wish to receive a copy of this Notice, you can contact us by calling, writing, or emailing us:

Global Holdings LLC  
4343 S. 118th East Ave., Ste. #220  
Tulsa, OK 74146  
[customersupport@ghllc.com](mailto:customersupport@ghllc.com)  
1-877-271-1550.

**Please print and retain a copy of this California Privacy Notice for your records.**

**For a PDF version of this Privacy Notice For California Consumers suitable for printing as a separate document, please click <https://www.ghllc.com/ccpa-privacy/>. You must have PDF software such as Adobe Acrobat Reader in order to view and print PDF documents. If you need Acrobat Reader, you can download it from Adobe for free by clicking [here](#).**