

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE



Last Updated: January 1, 2023

Effective Date: January 1, 2023

Changes to Our California Privacy Notice

PNC will update this notice in response to changing legal, technology, or business developments. We will post the most up-to-date notice on <https://www.navycash.com/#/privacyPolicy>. 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 PNC through our website or by following the details below.

Contents:

1. INTRODUCTION
2. CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED
3. PURPOSES FOR COLLECTION, USE AND DISCLOSURE
4. YOUR RIGHTS AND CHOICES
5. CHANGES TO OUR PRIVACY POLICY
6. CONTACT INFORMATION

1 INTRODUCTION

1.1 PNC Financial Services Group, Inc. (collectively, "we," "our," "us," "PNC") is committed to protecting the privacy of personal information of individuals. This Privacy Notice supplements the information contained in the Privacy Policy of PNC and its subsidiaries 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 (CCPA) and the regulations promulgated thereto, each as amended, including pursuant to the California Privacy Rights Act of 2020 (the "CPRA"). Any terms defined in the CCPA have the same meaning when we use them in this notice.

1.2 This Notice does not apply to or describe information that is not personal information or is otherwise exempt from the CCPA, including:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media.
- 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 CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED

2.1 We collect 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 ("personal information"). In particular, we have collected and processed the categories of personal information (as defined by the CCPA) as listed in Section 2.2 in the last twelve (12) months.

2.2 While our processing of personal information varies based upon our relationship and interactions with consumers, the table below identifies, generally, the categories of personal information (as defined by the CCPA) that we have collected about California residents, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. Please note that 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	Such as precise physical location or movements within 1850 feet.
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. Education information	Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). This category of PII is not collected by PNC.
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
L. Sensitive Personal Information	Personal information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; or genetic data.

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

2.3 PNC does not "sell" or "share" (as defined by the CCPA) personal information or sensitive personal information about California residents, including those we know to be under sixteen (16) years of age.

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 on our websites — for example, from submissions through our website portal or website usage details we collect automatically and the devices you use to access our website.
- From third parties that interact with us in connection with the services we perform — for example, from credit bureaus when we offer or extend credit to you.

2.5 We retain the personal information we collect only as reasonably necessary for the purposes described in this notice or otherwise disclosed to you at the time of collection. The length of time varies depending upon the circumstances, including the type of information, purposes of collection, and applicable compliance, risk management and legal obligations. (For example, we will retain your transactional data for as long as necessary to comply with our tax, accounting, compliance, risk management and recordkeeping obligations, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and comply with legal obligations.)

3 PURPOSES FOR COLLECTION, USE AND DISCLOSURE

3.1 Subject to Section 3.2, we may collect, use, and disclose the personal information we collect about California consumers for one or more of the following business or commercial 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 and respond to 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 communicate with you, including transactional and account-related information as well as news, updates, and marketing communications.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads, including through our websites and via phone, 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 PNC's assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by PNC about our website's users is among the assets transferred.

3.2 Notwithstanding Section 3.1, we only use and disclose sensitive personal information as reasonably necessary (i) to perform our services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our services, (v) for compliance with our legal obligations, (vi) to our service providers who perform services on our behalf, and (vii) for purposes other than inferring characteristics about you. We do not use or disclose your sensitive personal information other than as authorized pursuant to section 7027 of the CCPA regulations (Cal. Code. Regs., tit. 11, § 7027 (2022)).

3.3 We may disclose each of the above categories (refer to table in section 2.2) of your personal information for a business purpose to the following categories of third parties:

Categories of Third Parties	Categories of Data that May Be Shared
Service Providers	All*
Advisors & Agents	<ul style="list-style-type: none"> • A: Identifiers • B: Personal information categories listed in the California Customer Records statute • C: Protected classification characteristics under California or federal law • D: Commercial information • K: Inferences drawn from other personal information
Regulators, Government Entities, & Law Enforcement	All*
Affiliates and Subsidiaries	<ul style="list-style-type: none"> • A: Identifiers • B: Personal information categories listed in the California Customer Records statute • C: Protected classification characteristics under California or federal law • D: Commercial information • F: Internet or other similar network activity • I: Professional or employment-related information • K: Inferences drawn from other personal information
Advertising Networks	<ul style="list-style-type: none"> • A: Identifiers • B: Personal information categories listed in the California Customer Records statute • F: Internet or other similar network activity • K: Inferences drawn from other personal information
Data Analytics Providers	<ul style="list-style-type: none"> • A: Identifiers • B: Personal information categories listed in the California Customer Records statute • D: Commercial information • F: Internet or other similar network activity • K: Inferences drawn from other personal information
Social Networks	N/A
Internet Service Providers, Operating Systems and Platforms	<ul style="list-style-type: none"> • A: Identifiers • B: Personal information categories listed in the California Customer Records statute • D: Commercial information • G: Geolocation data • H: Sensory data • K: Inferences drawn from other personal information
Data Brokers	<ul style="list-style-type: none"> • F: Internet or other similar network activity • G: Geolocation data
Business Customer/Client	N/A
Other Users (in accordance with your privacy settings)	All*
Others as Required by Law (e.g., disclosures of sweepstakes and contest winners)	All*

*PNC does not collect the information described in Category J Education Information

3.4 We will not collect additional categories of personal information or use or disclose the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

4 YOUR RIGHTS AND CHOICES

4.1 The CCPA provides consumers with specific rights regarding their personal information, as further described in this Section 4. PNC will respond to your requests as required by and subject to certain exceptions and limitations set forth in the CCPA. Please review this section for a description of your CCPA rights and how you make exercise those rights.

4.2 Access to Specific Information and a Copy of Personal Information (Right to Know)

You have the right to request, up to twice per year, that we disclose certain information to you about our collection and use of your personal information and to request a copy of the specific pieces of personal information that we

have collected about you (collectively, referred to as your “access” right), including:

- The categories of personal information we have collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting, selling, or sharing that personal information;
- The categories of personal information we have disclosed for a business purpose and third parties to whom we have disclosed your personal information for a business purpose;
- The categories of personal information we have sold to or shared and the categories of third parties to whom such information has been sold or shared (if applicable); and
- The specific pieces of personal information we collected about you (also called a data portability request).

4.3 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 and limitations.

4.4 Correction Rights

You have the right to request the correction of inaccurate personal information.

4.5 Do-Not-Sell or Share Rights

California residents also have the right to opt-out of the sale or sharing of their personal information by us. As noted above, we do not currently “sell” or “share” personal information about California residents, including those that we know to be under 16 years old.

4.6 Limit Use and Disclosure of Sensitive Personal Information Right

California residents also have the right to direct PNC to limit certain uses and disclosures of their sensitive personal information, which go beyond those specifically authorized pursuant to the CCPA. However, as stated in Section 4.2 above, we do not use and disclose sensitive personal information about California residents beyond these authorized purposes.

4.7 Submitting Request to Know/Access, Correct, and Delete

To exercise your right to know/access, correct, or delete as described above, please submit a verifiable consumer request (as described more fully below) to us by either:

- Calling us at 1-888-PNC-BANK (1-888-762-2265).
- Visiting <https://www.navycash.com/#/privacyPolicy>.

California residents may submit a verifiable request on their own behalf and on behalf of their minor child. Pursuant to the CCPA, authorized agents may also submit a verifiable request on behalf of another consumer for whom they have been duly appointed. 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.

A 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.

We will take steps to verify your request and to identify our relevant records that contain your personal information. We will process your request based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. In some cases, we may request additional information in order to verify your request or where necessary to process your 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 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.

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 a total of 90 days), we will inform you of the reason and extension period in writing.

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

4.8 Non-Discrimination

California consumers also have the right to exercise their CCPA rights without being subject to discriminatory treatment or retaliation, and to receive transparent disclosures about any financial 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.

5 CHANGES TO OUR PRIVACY NOTICE

We may amend this privacy notice from time-to-time. We will provide notice of any material changes we make to this privacy notice, such as by through a notice on our website homepage or via email.

6 NOT COVERED BY THIS NOTICE

This Notice does not address or apply to any of the nonpublic information we collect about consumers, pursuant to the Gramm-Leach-Bliley Act (GLBA) or otherwise subject to an exemption under CCPA Section 1798.145. For information, please review our Privacy Notice.

This CCPA notice does not apply to the U.S. Department of the Treasury as the designating agency for Navy Cash® Card and Navy Cash® Visitor Card.

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: 1-888-PNC-BANK (1-888-762-2265)
Website: <https://www.navycash.com/#/privacyPolicy>