# **Online Privacy Notice**

You take online privacy seriously, and so does the Ally Financial Inc group of companies (which includes Ally Financial and Ally Bank, collectively "Ally"). The terms "we," "our," and "us" in this Notice refer to Ally and its family of companies.

Our Online Privacy Notice (the "Notice") describes the information we collect from and about you during your visit to our online interfaces (websites and mobile applications) owned or controlled by us (the "Site"). It also describes how we use information about you, with whom we share it and how we protect it. This Notice applies only to those Ally interfaces that link directly to this Notice.

It's important to know that our websites may contain links to third party sites not controlled by Ally or covered by this Notice. We recommend that you check the privacy statements of other sites you visit before providing any personal information.

Once you become a customer of Ally, and once a year while you remain a customer of Ally, we will provide you with an Ally Consumer Privacy Notice that describes our privacy practices and provides you choices in the sharing of your information, as required by law.

# **Personal Information We Collect**

We collect Personally Identifiable Information ("PII") about you from the information you provide to us when you visit our websites. The information we collect will depend on the Site you visit. This information may include, but is not limited to:

- Name
- Address
- Social Security number in whole or in part
- Phone numbers (including mobile)
- Account number
- Account number at a bank or other financial institution, type of bank account and the name of bank and other financial institution
- Demand Note number
- Email address
- Email referral information
- Date of birth
- Current residential information including mortgage or rent payments
- Employment information
- Income information
- Internet Protocol (IP) Address and/or domain
- Geo-location of your computer or mobile device
- Mobile carrier and/or Internet Service Provider

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

- processing your request for services, products or information
- improving our customer service and products
- servicing your account
- facilitating your participation in online activities

For example, we may use the information you provide when you complete an online application for a product or service in order to process and evaluate your application. If you request product information, we may use the information you provide to mail you information you request.

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.

# **How Personal Information Is Shared**

We may share the personal information 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.

We may share information about you with our affiliates (other companies in the Ally family) and with nonaffiliates for analysis, market research and marketing purposes as allowed by law.

Finally, we may disclose your personal information as otherwise permitted or required by law.

### Information collected via Cookies

We use a variety of technologies, including cookies, to collect information about your online/mobile activity when you visit our website. Cookies are small text files that a website server stores on your computer or device. They're typically used to remember your account login preferences, monitor website traffic, provide customer support like live chat and help us better customize our site for your individual preferences.

We may also use Flash<sup>®</sup> objects (sometimes called "Local Shared Objects") as part of our online authentication to help us recognize your computer when you come back to our site. We do not use Flash objects for any online behavioral advertising purpose.

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.

# **Online Behavioral Advertising (OBA) on Third Party Sites**

There are three ways we use OBA on third party websites and mobile apps that are not affiliated with Ally.

#### **Interest-Based Advertising**

The third parties we contract with may use cookies or other technologies to gather interest-based information to customize the ads you see. This information may be combined and linked with data from other sources. Neither the third parties nor Ally collects any personally identifiable information (PII) through these cookies. We may also use aggregate data to display ads or content that may interest you.

Ally has adopted the use of the <u>AdChoices Icon</u> (also known as the Advertising Option Icon) on our interest-based advertising (excluding ads appearing on platforms that do not accept the icon). You can click the AdChoices Icon to learn more and control whether or not you receive this type of advertising from participating companies.

#### **Device-Based Advertising**

We also use device information, particularly in mobile advertising, to help deliver our ads and measure ad campaign effectiveness. Ally and the companies we work with won't collect any personally identifiable information (PII) but may collect your device information when you visit one of our sites or see our ads. Compiling and comparing this information creates a unique ID for individual devices and can be "matched" to the same information on other sites or mobile applications. Some companies we work with are also able to associate related devices into households based on common characteristics, such as IP addresses.

#### **Device Usage Research**

We participate in the Adobe Marketing Cloud Device Co-op. This helps us understand how you use our website and apps across your devices so that we can better tailor promotions to you. <u>Learn more about</u> how Adobe's program works and manage your preferences.

# "Do Not Track" Signals

We do not respond to Web browser "Do Not Track" signals at this time. To prevent Ally or third parties from tracking, you can access your browser settings and disable or delete your cookies.

### **Changing or Updating Your Personal Information**

If you have questions about personal information you provided on an Ally website, select the "Contact Us" link – usually found in the navigation menu – or log into your Ally Auto account and select Account Information to edit your personal information or your Ally Bank account and select My Profile to edit your personal information.

### **Security Of Your Personal Information**

We restrict access to the personal information obtained from our website 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 personal information.

Additionally, 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.

# **Personal Information About Children**

We do not knowingly collect or maintain personal information about children under the age of 13 unless the personal information is provided by a parent, legal guardian or authorized adult. Our websites are not intended for children under 13. Visit the Federal Trade Commission website for more information on the Children's Online Privacy Protection Act (COPPA).

# Public Forums Available On Our Sites And Social Media

Public forums are available on our Sites, and they may include text, photographs and videos that are accessible to the general public. Unless we tell you otherwise, any information you disclose in these areas may become public information.

We also provide experiences through social media sites such as Facebook, Twitter, LinkedIn and YouTube. Any and all information you share on these Social Media sites is visible to any visitor to these sites. Refer to each social media site for their Terms of Use and Privacy Policies.

You should use caution when deciding to disclose personal information in these areas.

### **Changes to this Notice**

This Notice is effective December 15, 2017. We reserve the right to alter this Notice at our discretion. Any change to this Notice will be posted on our Sites in a timely manner.