



United Services Automobile Association  
9800 Fredericksburg Road  
San Antonio, TX 78288

# CALIFORNIA CONSUMER PRIVACY ACT NOTICE AT COLLECTION

Respecting your privacy is a priority to us. This California Consumer Privacy Act Notice at Collection (the “Notice at Collection”) explains how United Services Automobile Association (USAA) and its family of companies, including companies identified with the USAA name and Garrison Property and Casualty Insurance Company (collectively, “we,” or “us”), collect, use, retain, and disclose personal information relating to California residents who are subject to the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the “CCPA”). In addition to the terms defined herein, this Notice at Collection uses certain terms that have the meaning given to them in the CCPA.

## Does this Notice at Collection apply to me?

This Notice at Collection applies to individuals who reside in California and who have not attempted to establish eligibility with USAA or applied for or obtained USAA’s financial products or services for personal, family, or household purposes. This Notice at Collection also applies to individuals who reside in California whose Personal Information is collected, used, or disclosed in connection with corporate transactions and USAA’s due diligence activities for a potential or actual transaction between USAA and another business, such as proposed or actual mergers, acquisitions or divestitures. The individuals to whom this Notice at Collection applies are collectively referred to as “Covered Individuals” or “you” throughout this Notice at Collection.

This Notice at Collection does not apply to individuals who do not reside in California, nor to California residents who have applied for or obtained USAA’s financial products or services for personal, family, or household purposes.

## What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Covered Individual or their household.

The information that we collect in connection with USAA’s financial products or services that Covered Individuals apply for or obtain for personal, family, or household use is not subject to the requirements of the CCPA, or addressed by this Notice at Collection because such data is already protected under the Gramm-Leach-Bliley Act (“GLBA”), and the CCPA does not apply to such information. This Notice at Collection also does not apply to information processed pursuant to the Fair Credit Reporting Act (“FCRA”), nor to protected health information processed pursuant to the Health Insurance Portability and Accountability Act (“HIPAA”) because the CCPA does not apply to such information. Please see [usaa.com/privacy](http://usaa.com/privacy) for more information about our privacy practices with respect to such information.

## Our Collection, Use, and Retention of Personal Information

We collect Personal Information about Covered Individuals in a variety of contexts, including for example, Personal Information relating to those who may be eligible for USAA products or services, but who do not have an existing customer or consumer relationship with us those who apply for employment with us, those who are prospective, current, or former vendors, contractors, or similar personnel, and those who enter into our contests and promotions. The Personal Information we collect, use, retain and disclose relating to a Covered Individual will depend on our specific relationship or interaction with that individual.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

### 1. Categories of Personal Information We Collect

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this Notice at Collection) the following categories of Personal Information about you:

- **Identifiers:** Identifiers, such as real name, alias, postal address, unique personal identifier (e.g., device identifier, unique pseudonym, user alias/ID), telephone number, online identifier, internet protocol address, email address, Social Security number, driver’s license number, passport number, date of birth, and other similar identifiers;
- **Personal Information Described in Additional Data Subject to Cal. Civ. Code § 1798.80(e):** Personal information, as defined in the California safeguards law, such as contact information and financial information;
- **Protected Classifications:** Characteristics of protected classifications under California or federal law, such as

race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status;

- **Commercial Information:** Commercial information, such as transaction and account information;
- **Biometric Information:** Biometric information, such as fingerprints and voiceprints;
- **Internet or Network Activity Information:** Internet or other electronic network activity information, such as browsing history and interactions with our website;
- **Geolocation Data:** Geolocation data, such as device location;
- **Audio, Electronic, Visual, or Similar Information:** Such as call and video recordings;
- **Professional or Employment Information:** Professional or employment-related information, such as work history and prior employer;
- **Education Information:** Education information, such as school and date of graduation;
- **Inferences:** Inferences drawn from any of the Personal Information listed above to create a profile about, for example, and individual's preferences and characteristics; and
- **Sensitive Personal Information:** Personal Information that reveals a Covered Individual's: Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in connection with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic group, religious or philosophical beliefs, or union membership; contents of mail, email, and text messages unless we are the intended recipient of the communication; and genetic data. Sensitive Personal Information also includes biometric information processed for the purpose of uniquely identifying a Covered Individual, as well as Personal Information collected and analyzed concerning a Covered Individual's health, sex life, or sexual orientation.

We only collect and process Personal Information that is considered to be Sensitive Personal Information under the CCPA for the purposes set forth in Section 3. We do not collect or process Sensitive Personal Information with the purpose of inferring characteristics about Covered Individuals.

## 2. Purposes for Collection of Personal Information

The business purposes for which we may use the Personal Information that we collect depends on our relationship or interaction with a specific Covered Individual. We may use (and may have used during the 12-month period prior to the Last Updated date of this Notice at Collection) your Personal Information: (1) to operate, manage, and maintain our business; (2) to provide our products and services; (3) for our employment and vendor management purposes; and (4) to accomplish our internal purposes and objectives (e.g., to personalize, develop, and market our products and services; conduct research and data analysis; detect and prevent fraud; maintain our facilities, systems and infrastructure; conduct risk and security control and monitoring; perform accounting, audit, and other internal functions, such as identity verification and internal investigations; comply with law, legal process, and internal policies; maintain business records; and exercise and defend against legal claims).

We also may have used your Personal Information for the following business purposes specified in the CCPA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage, or providing similar services;
- Providing advertising and marketing services to you, except for cross-context behavioral advertising (which is addressed in the "Sharing of Personal Information" section of this Notice at Collection);
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us;
- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and

- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

In addition to the business purposes identified above, we may use (and may have used during the 12-month period prior to the Last Updated date of this Notice at Collection) your Personal Information in connection with corporate transactions and USAA's due diligence activities for a potential or actual transaction between USAA and another business, such as proposed or actual mergers, acquisitions or divestitures.

### **3. Sharing of Personal Information**

We do not sell your Personal Information in exchange for monetary compensation. Under the CPRA, allowing certain third parties to collect Personal Information via automated technologies on our websites and apps for cross-context behavioral advertising purposes is considered the "sharing" of your Personal Information.

We may share for the business purposes described in Section 3 of this Notice at Collection and for cross-context behavioral advertising to you, and may have shared during the 12-month period prior to the Last Updated date of this Notice at Collection, the following categories of Personal Information about you to third-party online advertising services:

- Identifiers (including name, email address, phone number, address, USAA audience segment names, device or cookie data, and IP address), which are provided in hashed or encrypted form; and
- Internet or network activity information (including websites you've visited, the amount of time spent on specific USAA web pages, etc.).

You have the right to opt out of the sharing of your Personal Information for cross-context behavioral advertising purposes. USAA offers this right via two channels, 1) a dynamic Do Not Share My Personal Information link based on the geographic location indicated by your device's IP address, and 2) by recognizing a Global Privacy Control (GPC) opt out signal if you have enabled GPC in your browser. Please visit the [Global Privacy Control](#) website for more information. If your device is within an eligible jurisdiction, you may opt out of the sharing of your Personal Information for cross-context behavioral advertising purposes by clicking the "Do Not Share My Personal Information" link in the footer section of applicable USAA webpages or by enabling GPC in your browser, which USAA will consider as a request to opt out. Your choice will only apply to the browser on the device you are using at the time. If you visit our website using another browser or device, you will need to set your choice for that device or browser individually. If you do not see the "Do Not Share My Personal Information" link but believe you may be eligible to opt out, you may call the phone number listed in this notice.

### **4. Retention of Personal Information**

We retain Personal Information for the time period reasonably necessary to achieve the purposes described in this Notice at Collection, or any other notice provided at the time of collection, unless a longer retention period is required or permitted by applicable law, taking into account applicable statutes of limitation and our records retention requirements and policies.

### **5. California Consumer Privacy Act Notice**

For more information, you may view our [California Consumer Privacy Act Notice](#) (the "CCPA Notice").

#### **Contact Information**

If you have a question or concern about our privacy policies and practices, please contact us at: 800-531-7154 and ask to speak with a representative.

#### **Changes to This California Consumer Privacy Act Notice at Collection**

We may change or update this Notice at Collection from time to time. When we do, we will post the revised Notice at Collection on this page with a new "Last Updated" date.

**Last Updated Date:** January 24, 2024