

REGIONAL MANAGEMENT ONLINE PRIVACY POLICY

Last Updated – June 30th, 2023

INTRODUCTION

Regional Management Corp. and its subsidiaries and affiliates (“Regional Management,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using the website www.RegionalManagement.com (“Site”) and the services provided through that Site (“Services”). For information regarding our consumer operations, please visit our consumer website at RegionalFinance.com.

If you have a consumer financial product or service with us, we will use and share any information that we collect from or about you in accordance with our [U.S. Consumer Privacy Notice](#), which offers you certain choices with respect to the use and sharing of your personal information.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:

- 1. INFORMATION WE COLLECT ONLINE**
- 2. HOW WE USE YOUR INFORMATION**
- 3. HOW WE SHARE YOUR INFORMATION**
- 4. COOKIES AND OTHER TRACKING TECHNOLOGIES**
- 5. “DO NOT TRACK” SIGNALS**
- 6. CHOICES ABOUT YOUR PERSONALLY IDENTIFIABLE INFORMATION**
- 7. SECURITY**
- 8. THIRD PARTY LINKS**
- 9. CHILDREN’S PRIVACY**
- 10. NOTICE TO CALIFORNIA RESIDENTS**
- 11. ACCESSIBILITY**
- 12. HOW TO CONTACT US**

1. INFORMATION WE COLLECT ONLINE

We collect Personally Identifiable Information from you through your use of the Site and Services. “Personally Identifiable Information” is individually identifiable information about an

individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

Information You Provide

We may collect the following Personally Identifiable Information that you voluntarily provide to us in using our Site and Services:

- *Email alerts.* If you sign up to receive email alerts, we will collect your email address.
- *Earnings Calls.* If you sign up to attend an earnings call webcast, we will collect your name, email address, company name, and phone number. We use [ViaVid](#) for our webcasts.
- *Information Request Form.* If you complete our information request form, we will collect your name, title, organization, address, phone number, fax number, and email address.
- *Contact Us.* If you choose to contact us by email, you will provide us with your email address and any Personally Identifiable Information that you choose to provide in your message. We maintain record of your correspondence.

Third Party Information

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, when you fill out our online forms you may provide the contact information of another individual. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Policy.

2. HOW WE USE YOUR INFORMATION

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Site and Services, and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Protect the security and integrity of our Site[s] and Services;

- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our [Terms of Use](#), and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Policy and any other applicable agreements and policies;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our terms of use;
- Defend our legal rights and the rights of others;
- Fulfill any other purposes for which you provide it, or any other purpose we deem necessary or appropriate;
- Efficiently maintain our business; and
- Comply with applicable law.

3. HOW WE SHARE YOUR INFORMATION

We may share the information that we collect about you in the following ways:

- With our corporate family, such as with subsidiaries, joint ventures, and affiliates;
- With vendors who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.);
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our or a third party's legal rights, including providing information to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events;
- With any other person or entity where you consent to the disclosure;

- For any other purpose disclosed by us when you provide the Personally Identifiable Information or for any other purpose, we deem necessary, including to protect the health or safety of others.

4. COOKIES AND OTHER TRACKING TECHNOLOGIES

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets). We use Cookies to enable the Site to function. To learn more about how we use Cookies and your choices regarding our use of cookies in the Site, please see our [Cookie Policy](#).

5. “DO NOT TRACK” SIGNALS

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Site does not currently interpret, respond to or alter its practices when they receive “Do Not Track” signals.

6. CHOICES ABOUT YOUR PERSONALLY IDENTIFIABLE INFORMATION

Review and Request Changes to Your Personally Identifiable Information

To review or request changes to any of your Personally Identifiable Information, please contact us as provided in the “HOW TO CONTACT US” section below.

Marketing Communications

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at customerservice@regionalmanagement.com.

7. SECURITY

We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

8. THIRD PARTY LINKS

The Site and Services may contain links that will let you leave and access another website. Linked websites are not under our control. Except as stated below, this Privacy Policy applies solely to Personally Identifiable Information that is acquired by us on the Site and Services. We accept no responsibility or liability for these other websites.

9. CHILDREN’S PRIVACY

The Site and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

10. NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”) requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this “**Notice to California Residents**” section we will refer to this information as “Personal Information.”

The CCPA’s privacy rights described below do not apply to Personal Information that we collect, process, sell, or disclose subject to the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. Because we are subject to those laws and regulations, much of the Personal Information that we collect is exempt from the CCPA. Your choices and rights with respect to our use and sharing of that information are subject to our [U.S. Consumer Privacy Notice](#).

The CCPA’s privacy-related rights also do not apply to certain types of Personal Information subject to the Federal Credit Reporting Act (“FCRA”). Some of our services are subject to the FCRA and, therefore, exempt from the CCPA on that basis.

The below disclosures relate to the processing of Personal Information with respect to investors. For information regarding our collection of Personal Information from consumers, please see the Notice to California Residents in our [Regional Finance Privacy Policy](#).

Notice at Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated Date of this Privacy Policy, have collected the following categories of Personal Information:

- Identifiers (name, home address, postal address, and email address)
- Telephone number
- Fax number
- Request of information investor/non-investor status

We collect Personal Information directly from California. We do not collect all categories of Personal Information from each source.

In addition to the purposes stated above in the Section “**HOW WE USE YOUR INFORMATION**” we currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- 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
- Performing services, including providing customer service
- Undertaking activities to verify or maintain the quality or safety of our Services and to improve, upgrade, or enhance same
- Commercial purposes, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

Sale, Sharing, and Disclosure of Personal Information

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the category of recipients to whom we disclosed the Personal Information.

Category of Personal Information	Category of Recipients
Email address	Email service provider

We disclosed Personal Information for the business and commercial purposes identified in the prior section of this policy.

We have not sold or shared Personal Information in the twelve (12) months preceding the Last Updated Date of this Privacy Policy. We do not knowingly sell the Personal Information of minors under 16 years of age. We do not use Sensitive Personal Information for purposes other than those the CCPA and its regulations allow for.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;
- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

How to Submit a Request to Know, Delete, and/or Correct

You may submit a request to know, delete and/or correct by calling us toll-free at (833) 708-4357 or by completing our webform, available [here](#).

As mentioned above, if you are a California resident who has a financial product or service with us, much of the Personal Information that we collect is exempt from the CCPA and, therefore, is not subject to the rights discussed in this “Notice to California Residents” section. Your choices and rights with respect to our use and sharing of that information are subject to our [U.S. Consumer Privacy Notice](#).

Our Process for Verifying a Request to Know, Delete, and/or Correct

If we determine that your request is subject to an exemption or exception, we will notify you of our determination. If we determine that your request is not subject to an exemption or exception, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure or deletion as applicable.

For requests to access categories of Personal Information and for requests to delete or correct Personal Information that is not sensitive and does not pose a risk of harm by unauthorized deletion, we will verify your identity to a “reasonable degree of certainty” by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

For requests to access specific pieces of Personal Information or for requests to delete or correct Personal Information that is sensitive and poses a risk of harm by unauthorized deletion or correction, we will verify your identity to a “reasonably high degree of certainty” by verifying at least three pieces of Personal Information you previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you must submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

11. ACCESSIBILITY

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.

12. HOW TO CONTACT US

To contact us for questions or concerns about our privacy policies or practices please email us at customerservice@regionalmanagement.com.

Regional Management Corp.

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