

# U.S. CONSUMER PRIVACY NOTICE

#### 1. About This Notice

Pursuant to the consumer privacy laws listed below, including any respective implementing regulations (collectively, "U.S. Consumer Privacy Laws"), United Services Automobile Association and its family of companies, including companies identified with the USAA name and Garrison Property and Casualty Insurance Company (collectively, "USAA," "we," or "us") are providing this U.S. Consumer Privacy Notice ("Privacy Notice") to explain our privacy practices.

This Privacy Notice applies exclusively to consumers ("you") within the following states:

State	U.S. Consumer Privacy Law
Montana	Montana Consumer Data Privacy Act (MTCDPA)

This Privacy Notice does not apply to any of the following:

- Personal information that we collect and process from job applicants, employees, directors, contractors, service providers, or similar personnel.
- Personal information that we collect and process in connection with establishing eligibility with USAA or with USAA's financial products and services.
- Personal information that we collect and process pursuant to the Gramm-Leach-Billey Act (GLBA), Fair Credit Reporting Act (FCRA), or the Health Insurance Portability and Accessibility Act (HIPAA).

When we refer to personal information and our privacy practices within this Privacy Notice, such references are only intended to apply to personal information and our privacy practices that are subject to the U.S. Consumer Privacy Laws, as described within this Privacy Notice. The personal information we collect, process, disclose and maintain depends on our interaction with you. To the extent we process deidentified information, we will process and maintain such information in deidentified form and will not attempt to reidentify it unless permitted by applicable law

## 2. Personal Information We Collect and Process

We may collect, and may have collected in the preceding 12 months, the following categories of personal information:

- 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 Defined in Applicable Customer Records Laws.** Personal information, as defined in applicable customer records laws, 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. Information such as call and video recordings.

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- **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.
- 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 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; genetic data; and neural data. Sensitive Personal Information also includes biometric information processed for the purpose of uniquely identifying a consumer, as well as personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.

#### 3. Sources of Personal Information

We may collect, and may have collected in the preceding 12 months, personal information from the following sources:

- You (directly from you);
- Your devices, such as when you visit our websites or use our mobile apps;
- Our family of companies;
- Public records:
- Consumer reporting agencies;
- Our service providers;
- Companies and businesses such as advertising networks, internet service providers, data analytics providers, operating systems and platforms, social networks and data brokers; and
- Government entities.

#### 4. Purposes for Collection

We may collect, and may have collected in the preceding 12 months, personal information for the following purposes:

- To operate, manage and maintain our business;
- To offer and provide our products and services, including purposes such as marketing, advertising, personalizing, targeted marketing and cross-context behavioral advertising.
- To communicate with you;
- To manage relationships with our employees, service providers, and vendors.
- To accomplish our business purposes and objectives, such as to develop, maintain, improve, repair our products and services;
- To conduct research, analytics and data analysis;
- To detect and prevent fraud:
- To maintain our facilities, systems and infrastructure;
- To conduct risk and security control monitoring, including internal investigations and identity verification;
- To perform due diligence and similar activities in connection with corporate transactions, such as for proposed or actual mergers, acquisitions, and divestitures;
- To perform accounting, audit, validation and similar review functions:
- To comply with internal policies and applicable law, legal process, exercise and defend legal claims, and fulfill legal obligations; and
- To maintain records.

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We do not use personal information for the purpose of profiling in furtherance of automated decisions that produce legal or similarly significant effects to you, such as limiting access to our products or services.

We only use personal information that is considered to be sensitive personal information or sensitive data for the purposes set forth in Section 4, or otherwise, only with your consent.

## 5. Disclosing Personal Information

We may disclose, and may have disclosed in the preceding 12 months, the following categories of personal information with our affiliates, advertising networks, social networks, internet service providers, data analytics providers, government entities and certain third-party businesses (certain third-party businesses solely in connection with corporate transactions) for the purposes set forth in Section 4:

- Identifiers
- Personal Information Defined in Applicable Customer Record Laws
- Protected Classifications
- Commercial Information
- Biometric Information
- Internet and Network Activity Information

- Geolocation Data
- Audio, Electronic, Visual, or Similar Information
- Professional or Employment Information
- Education Information
- Inferences
- Sensitive Personal Information

#### 6. Sharing and Selling Personal Information

We do not sell personal information in exchange for direct monetary compensation. However, we use and process personal information for targeted advertising and cross-context behavioral advertising whereby we permit nonaffiliated third-party online advertising services to collect personal information through automated technologies on our websites and apps to display our advertisements and marketing materials. Some U.S. Consumer Privacy Laws consider this type of activity as sharing personal information. We may share, and may have shared in the preceding 12 months, the following categories of personal information with third-party online advertising services for targeted advertising and cross-context behavioral advertising:

- Identifiers
- Internet and Network Activity Information

You have the right to opt-out of the sharing of your personal information for the purposes of targeted marketing and cross-context behavior advertising, as described in Section 8.

We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

# 7. Retention of Personal Information

We retain Personal Information for the time period reasonably necessary to achieve the purposes described in this Privacy Notice, or any other notice provided at the time of collection, unless a longer retention period is required or permitted by applicable law. We consider applicable law, statutes of limitation, industry standards, contractual requirements, and our internal records retention requirements and policies when determining retention periods.

# 8. Privacy Rights and Requests

Depending on the applicable U.S. Consumer Privacy Law, you may have some or all of the following privacy rights:

## **Know and Access**

You may request that we disclose to you the following information:

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- The categories of personal information we collected about you and the categories of sources from which we collected such personal information;
- The business or commercial purpose(s) for collecting or sharing personal information about you;
- The categories of personal information about you that we shared and the categories of third parties to whom we shared such personal information:
- The categories of personal information about you that we disclosed to third parties for a business or commercial purpose and the categories of third parties to whom we disclosed such personal information; and
- The specific pieces of personal information we collected about you.

We are not required to provide this information to you more than twice within any 12-month period.

#### Delete

You may request that we delete personal information we collected about you, subject to certain limitations, such as if we are required by law to retain such information or retaining such information is necessary for us to perform certain functions like providing the product or service you requested, protecting against fraud, or detecting and investigating security incidents.

## Correct

You may request that we correct inaccurate personal information we maintain about you.

#### Portability

You may request to obtain a copy of your personal information in a portable, readily usable format.

## Non-Discrimination

You have the right to be free from unlawful discrimination for exercising the privacy rights available to you under the U.S. Consumer Privacy Laws.

## Opt-Out of Sharing for Targeted and Cross-Context Behavioral Advertising

You may opt-out of the sharing of your personal information for targeted advertising and cross-context behavioral advertising.

## 9. How to Make Requests

You may exercise any applicable privacy rights by submitting a request at <u>usaa.com/privacy/consumer-rights-request</u> or by contacting us at (800)-531-USAA (8722).

When you make a request, we may authenticate your identity through our online services or by phone using our security procedures. If you have a USAA number, we may also verify your identity if you login to our websites or mobile app when you make your request. We will verify your identity by associating the information you provide to us within your request with any personal information we may maintain about you, but you may be required to submit additional information to enable us to process certain requests. In such instances, the information you provide to us will only be used for the purposes of verifying your identity and processing your request(s).

Depending on the applicable U.S. Consumer Privacy Laws, authorized agents, parents, legal guardians and conservators may be permitted to submit a privacy rights request, in the manner described above, on your behalf. As applicable, we may verify the identity of such individuals and require such individuals to prove that they are authorized to act on your behalf. We may also require you to verify your own identity with us and/or directly confirm such individuals' authority to act on your behalf.

Depending on the applicable U.S. Consumer Privacy Laws, if we deny or otherwise refuse to act on your request, you may appeal the determination within 60 days after receiving our determination. You may submit your appeal by contacting us at (800)-531-USAA (8722).

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If available to you, a link entitled [Do Not Sell or Share My Personal Information, or Your Privacy Rights] will be displayed within the footer on our relevant websites and mobile apps that will take you to a webpage where you may opt-out of targeted marketing and cross-context behavior advertising. If the link is not displayed to you, but you believe that it should be available to you, please contact us. We also recognize a Global Privacy Control (GPC) opt-out signal if you have enabled GPC in your browser. If you have enabled GPC in your browser, we will consider it as a request to opt-out of targeted marketing and cross-context behavioral advertising. Your opt-out request will only apply to the browser on the device you are using at the time. If you visit our websites or mobile app using another browser or device, you will need to set your choice for that device or browser individually. Please visit the Global Privacy Control website for more information.

# 10. Changes

We may change or update this Privacy Notice from time to time. When we do, we will post the revised Privacy Notice on our websites and mobile app with a new "Last Updated" date.

#### 11. Contact Information

If you have a question or concern about this Privacy Notice or our information practices, please call us at (800)-531-USAA (8722).

Last Updated: October 1, 2025

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