



# California Consumer Privacy Act Privacy Policy

## Effective January 1, 2023

Privacy of personal information is important to Orange County's Credit Union ("OCCU", "Credit Union", "we", "us", or "our" depending on context). This California Consumer Privacy Act Privacy Policy ("Privacy Policy") explains how OCCU collects, uses, shares, protects, and discloses personal information relating to California residents that are subject to the California Consumer Privacy Act of 2018 ("CCPA") and describes our online and offline information practices.

This Privacy Policy supplements the OCCU Online Privacy Policy, and other relevant privacy policies. This Privacy Policy applies solely to California residents in accordance with the CCPA and the California Online Privacy Protection Act ("CalOPPA"). Any terms defined in the CCPA and the CalOPPA have the same meaning when used in this Privacy Policy.

Keeping personal information secure is a critically important priority. Consistent with our obligations under applicable laws and regulations, OCCU has physical, technical, electronic, procedural and organizational safeguards and security measures that are designed and maintained to protect personal information against unauthorized or illegal access, destruction, use, modification, or disclosure, whether it is processed by us or a service provider, contractor, or third party.

## Selling Personal Information

We do not sell your personal information for monetary consideration. However, there may be instances where we disclose or share your information with a third party for other valuable consideration. When we refer to "sell", "selling", "sale", or "sold" in this Privacy Policy, we are referring to disclosure or sharing of personal information for valuable consideration other than money.

## California Consumer Rights Under the CCPA

The CCPA provides California residents with specific rights regarding their personal information.

### Right of No Retaliation Following Opt Out or Exercise of Other Rights

The Credit Union shall not discriminate against a consumer because of their exercise of any of the rights provided by the CCPA. Unless permitted by law, the Credit Union will not:

- Deny you goods or services,
- Charge you a different price or rate for goods or services, including through granting discounts or other benefits, or imposing penalties,
- Provide you a different level or quality of goods or services,
- Suggest that you receive a different price or rate for goods or services or a different level of quality of goods or services, or
- Retaliate against an employee, applicant for employment, or independent contractor, for exercising rights under the CCPA.

### Right to Know What Personal Information is Being Collected and to Access Personal Information

You have the right to request the Credit Union disclose the following:

- The categories of personal information collected about you.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting, selling, or sharing personal information.
- The categories of third parties to whom the Credit Union discloses personal information.
- The specific pieces of personal information collected about you.

### Right to Request Deletion of Personal Information

You have the right to request that the Credit Union delete any personal information about you that we have collected from you. Once we receive and verify your request, we will delete your personal information from our records, and notify our service providers and contractors to delete your personal information from their records, and notify any third party to whom we have shared your personal information to delete it. We will maintain a confidential record of deletion requests for compliance with laws. We may deny your deletion request if retaining the information is necessary for the Credit Union or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing relationship with you, or otherwise perform our contract with you.
- Ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, if deletion of the personal information is likely to render impossible or seriously impair the ability to complete such research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with the Credit Union and with the context in which you provided the information.
- Comply with a legal obligation.

### Right to Correct Inaccurate Personal Information

You have the right to request the Credit Union correct personal information maintained about you that you believe is inaccurate.

### Right to Know What Personal Information is Sold or Shared and to Whom

You have the right to request the Credit Union disclose the following:

- The categories of personal information collected about you.
- The categories of personal information sold or shared about you and the categories of third parties to whom the personal information was sold or shared.
- The categories of personal information disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

### Right to Opt Out of Sale or Sharing of Personal Information

You have the right, at any time, to direct the Credit Union not to sell or share your personal information. This right may be referred to as the right to opt-out of sale or sharing. This information may be sold or shared and you have the “right to opt-out” of the sale or sharing of your personal information. We shall not sell or share the personal information of consumers if we have actual knowledge that a consumer is less than 16 years of age, unless the consumer, in the case of consumers at least 13 years of age and less than 16 years of age, or the consumer’s parent or guardian, in the case of consumers who are less than 13 years of age, has affirmatively authorized the sale or sharing of the consumer’s personal information. After receiving an opt-out direction, we will not sell or share the consumer’s personal information, unless the consumer subsequently provides consent, for the sale or sharing of the consumer’s personal information.

### Right to Limit the Use and Disclosure of Sensitive Personal Information

You have the right, at any time, to direct the Credit Union to limit the use of your sensitive personal information to that which is necessary to:

- Perform the services or provide the goods reasonably expected by an average consumer,
- Help ensure security and integrity,
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of the consumer’s current interaction with the Credit Union,
- Perform services on behalf of the Credit Union, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the Credit Union.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Credit Union, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Credit Union.

Before we use or disclose your sensitive personal information for a purposes other than those specified in this privacy policy, we shall provide notice to consumers that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information. After receiving direction from a consumer not to use or disclose the consumer’s sensitive personal information, we will not use or disclose the consumer’s sensitive personal information for any other purpose unless the consumer subsequently provides consent for the use or disclosure the consumer’s sensitive personal information for additional purposes. Sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not subject to the right to limit its use and disclosure.

## **How to Exercise Your Rights Under the CCPA**

California residents, may submit a CCPA request by:

- Visiting our internet website <https://www.orangecountyscu.org> and completing our CCPA Request Submission Form which is accessible though the link “[CCPA Request](#)”.
- Visiting a [Branch](#) and submit a CCPA request with the assistance of a Member Service Representative.
- Calling the Credit Union’s toll-free telephone number (888) 354-6228, or the general telephone number (714) 755-5900 (phone charges may apply).

- For TDD hearing-impaired assistance through Relay Service dial 7-1-1, through the Relay Operator dial 1-800-238-4486, or through Teletypewriter (TTY) dial 1-800-826-7345.

California residents, may opt-out of the sale or sharing of their personal information, or direct the Credit Union to limit the use and disclosure of their sensitive personal information by:

- Visiting our internet website <https://www.orangecountyscu.org> and completing our Do Not Sell or Share My Personal information Opt-Out Submission Form which is accessible through the link "[Do Not Sell or Share My Personal Information](#)", or our Limit the Use of My Sensitive Personal Information Opt-Out Submission Form which is accessible through the link "[Limit the Use of My Sensitive Personal Information](#)".
- Visiting a [Branch](#) and submit the "Do Not Sell or Share My Personal Information" opt-out direction, or the "Limit the Use of My Sensitive Personal Information" direction, with the assistance of a Member Service Representative.
- Calling the Credit Union's toll-free telephone number (888) 354-6228, or the general telephone number (714) 755-5900 (phone charges may apply).
- For TDD hearing-impaired assistance through Relay Service dial 7-1-1, through the Relay Operator dial 1-800-238-4486, or through Teletypewriter (TTY) dial 1-800-826-7345.

You may have an authorized agent submit a CCPA request, an opt-out direction, or the Limit the Use of My Sensitive Personal Information direction, on your behalf. We will need to verify the identity of the authorized agent and the written authorization for the agent to make the CCPA submissions on your behalf. We will require the agent to submit a copy of their government issued identification card, and the signed permission, power of attorney, or the order appointing them conservator, as applicable, to this email address: [CCPAConsumerReply@orangecountyscu.org](mailto:CCPAConsumerReply@orangecountyscu.org)\* or by postal mail to Orange County's Credit Union, P.O. Box 11777, Santa Ana, CA 92711-1777 Attention: CCPA Request, or by hand delivery at one of [our local branches](#). We may require additional information to verify the agent's identity or the authorization.

Our response to your exercise of rights may be limited as permitted under law.

## Contact for Questions or Concerns

If you have questions or concerns about Orange County's Credit Union's privacy policies and information practices, you can receive assistance by:

- Visiting one of [our local Branches](#) where you can speak to one of our Member Service Representatives.
- Calling the Credit Union's toll-free telephone number (888) 354-6228, or the general telephone number (714) 755-5900 (phone charges may apply).
- For TDD hearing-impaired assistance through Relay Service dial 7-1-1, through the Relay Operator dial 1-800-238-4486, or through Teletypewriter (TTY) dial 1-800-826-7345.
- Writing to us at: Orange County's Credit Union, P.O. Box 11777, Santa Ana, CA 92711-1777 Attention: CCPA Privacy Questions

## Verification of Your Identity

Protecting personal information and providing the correct information in our response to your CCPA request necessitates verifying your identity. When a Credit Union Member submits a CCPA request, opt-out direction, or direction to limit the use and disclosure of sensitive personal information, their identity may be verified using the Credit Union's existing identity verification practices which follow the

Customer Identification Program (CIP) included as part of the Credit Union's Bank Secrecy Act / Anti-Money Laundering compliance program, and may require execution of the Consumer Requests Notarization Statement, depending on the method of request submission and if submission was by an authorized agent. Verifying the identity of non-members will require submission of the individual's government issued identification card, the Consumer Requests Notarization Statement, and may require additional identifying documentation.

For non-members submitting requests to know specific pieces of personal information, requests to delete, and requests to correct inaccurate personal information, a reasonably high degree of certainty is required when verifying identity, which means at least three (3) data points must be verified and the Consumer Request Notarization Statement will be required. For all other requests to know, opt-out directions, and directions to limit the use and disclosure of sensitive personal information, a reasonable degree of certainty is required when verifying identity, which means at least two (2) data points must be verified and execution of the Consumer Request Notarization Statement will be required.

### **Opt-Out Preference Signals**

The Credit Union does not accept opt-out preference signals sent with a consumer's consent by a platform, technology, or mechanism indicating a consumer's intent to opt out of the sale or sharing of the consumer's personal information or to limit the use or disclosure of the consumer's sensitive personal information, or both.

### **Response Time and Format of Response**

OCCU will acknowledge receipt of CCPA requests, opt-out directions, and directions to limit the use and disclosure of sensitive personal information within 10 days of submission and advise how long response is expected to take if we are able to verify your identity. Requests for specific pieces of Personal Information may require additional information to verify your identity including a signed and notarized declaration, that you are the individual whose information is being requested. Requests for deletion require a two-step confirmation process to verify a non-accountholder's identity. Requests submitted on behalf of another person, may require written proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, OCCU may not be able to honor a request. For example, OCCU will not honor a request if your identity cannot be verified or that you have the authority to make a request on behalf of another individual cannot be verified. Additionally, OCCU will not honor a request where an exception applies or where the personal information maintained is not subject to the CCPA's access or deletion rights. You will be advised in our response, if OCCU is not able to honor your request.

OCCU will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure creates the possibility of a substantial, articulable, and unreasonable risk to the security of that personal information, the consumer's account, or the security of the Credit Union's systems or networks.

OCCU will work to process all verified requests and respond within 45 days of receipt. If an extension is needed for up to an additional 45 days in order to process your request, OCCU will provide you with an explanation for the delay in writing, delivered by your preferred method of communication. Our

response will cover the 12-month period preceding receipt of the request, and may cover a longer period if the Credit Union, based on the criteria used to determine the period of retention, retains the personal information longer than the 12-month period preceding receipt of the request, but in no event prior to January 1, 2022. Our response will be in writing and delivered using the requestor's preferred communication method. We will endeavor to comply with an opt-out direction, or a direction to limit the use and disclosure of sensitive personal information within 15 business days of receipt, and will provide written notification by your preferred method of communication that the direction has been processed.

## Exemptions

Not all personal information is subject to the requirements of the CCPA. The rights and choices provided to consumers under the CCPA will not apply:

- If you are not a California resident.
- To personal information collected, processed, sold, or disclosed that is subject to the federal Gramm-Leach-Bliley Act ("GLBA") (Public Law 106-102), and implementing regulation, or the California Financial Information Privacy Act ("CFIPA") (Division 1.4 (commencing with Section 4050) of the Financial Code), or the federal Farm Credit Act of 1971 (as amended in 12 U.S.C. 2001-2279cc and implementing regulations, 12 C.F.R. 600, et seq.).
- To personal information collected, processed, sold, or disclosed pursuant to the Driver's Privacy Protection Act of 1994 (18 U.S.C. Sec. 2721 et seq.).
- To "aggregate consumer information" which means information that relates to a group or category of consumers, from which individual consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device. "Aggregate consumer information" does not mean one or more individual consumer records that have been deidentified.
- To "deidentified" information which means information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer provided that the business that possesses the information: (1) Takes reasonable measures to ensure that the information cannot be associated with a consumer or household. (2) Publicly commits to maintain and use the information in deidentified form and not to attempt to reidentify the information, except that the business may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes satisfy the requirements of the subdivision of the CCPA in which the definition of Deidentified appears. (3) Contractually obligates any recipients of the information to comply with all provisions of the subdivision of the CCPA in which the definition of Deidentified appears.
- To publicly available information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this paragraph, "publicly available" means: information that is lawfully made available from federal, state, or local government records, or 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; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience. "Publicly available" does not mean biometric information collected by a business about a consumer without the consumer's knowledge.
- To (i) requests to know what personal information is being collected (§1798.110), and (ii) requests to know what personal information is sold or shared and to whom (§1798.115) from the same consumer more than twice in a 12 month period.

- To personal information used to comply with federal, state, or local laws or comply with a court order or subpoena to provide information.
- To personal information used to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by a federal, state, or local authorities.
- To personal information used to cooperate with law enforcement agencies concerning conduct or activity that the Credit Union reasonably and in good faith believes may violate federal, state, or local law.
- To personal information used to cooperate with a government agency request for emergency access to a consumer's personal information if a natural person is at risk or danger of death or serious physical injury.
- To personal information used to exercise or defend legal claims.
- To communications protected by evidentiary privilege, such as attorney-client communications.
- To activities governed by the Fair Credit Reporting Act (FCRA) involving the collection, maintenance, disclosure, sale, communication, or use of any personal information bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency.
- To household data in connection with consumer requests to delete personal information about the consumer (§1798.105), to correct inaccurate personal information (§1798.106), to know what personal information is being collected (§1798.110), or to know what personal information is sold or shared and to whom (§1798.115).

## **Record Retention**

Information collected and maintained to comply with a CCPA request, an opt-out direction, or a direction to limit the use of sensitive personal information will not be used for any other purpose other than compliance with the CCPA and shall not be shared with any third party except as necessary to comply with a legal obligation. Personal information collected from a consumer solely in connection with verification of the consumer's request will not be further disclosed or used for unrelated purposes, and will not be retained longer than necessary for purposes of verification. The Credit Union will maintain a confidential record of deletion requests solely for the purpose of preventing the personal information of consumers who have submitted deletion requests from being sold, and compliance with privacy laws.

## **Personal Information**

The CCPA defines two groups of information pertaining to individuals. The first group is "Personal information" which the CCPA defines as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. The CCPA does not apply to information collected, processed or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. Personal information does not include consumer information that is deidentified or aggregate consumer information. The second group is "Sensitive Personal Information" which the CCPA defines as information that reveals a consumer's social security, driver's license, state identification card, or passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credential allowing access to an account; a consumer's precise geolocation; a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer's mail, email, and

text messages unless the Credit Union is the intended recipient of the communication; a consumer’s genetic data; the processing of biometric information for the purpose of uniquely identifying a consumer; personal information collected and analyzed concerning a consumer’s health; and personal information collected and analyzed concerning a consumer’s sex life or sexual orientation. Personal Information and Sensitive Personal Information do not include publicly available information or lawfully obtained, truthful information that is a matter of public concern.

“Business purpose” as defined by CCPA means the use of personal information for the business’s operational purposes, or other notified purposes, provided that the use of personal information shall be reasonably necessary and proportionate to achieve the purpose for which the personal information was collected or processed or for another purpose that is compatible with the context in which the personal information was collected.

## Notice at Collection and Use of Personal Information

### Categories of Personal Information and Sensitive Personal Information We Collect

We do not sell your personal information for monetary consideration. We may use the categories of personal information listed below for the business purposes listed below. OCCU has collected the following categories of personal information from California consumers in the preceding 12 months:

Categories of Personal Information	Examples
<b>A. Identifiers</b>	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account log-in, account name, social security number, social security card image, driver’s license number, driver’s license card image, passport number, passport image, state ID card number, state ID card image, telephone number, marital status, or other similar identifiers
<b>B. Customer Records Information</b>	signature, physical characteristics or description, insurance policy number, education, financial account or bank account number, credit card number, debit card number, security or access code, password or credential allowing access to an account, and other financial information, medical information, geolocation, ancestry, health information, sex life or sexual orientation, religious or philosophical beliefs, genetic data, disability, health insurance information, union membership, contents of mail, email, and text messages, audio, electronic, visual or similar information such as call and video recordings
<b>C. Protected Classifications</b>	Characteristics of protected classifications under California or federal law, such as race including racial or ethnic origin, color, national origin, age (40 years or older), sex, gender, and military and veteran status
<b>D. Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
<b>E. Biometric Information</b>	Physiological, biological or behavioral characteristics, including information pertaining to an individual’s deoxyribonucleic acid (DNA), that is used or is intended to be



Categories of Personal Information	Examples
	used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
<b>F. Geolocation Data</b>	Information used to identify your physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
<b>G. Sensory Data</b>	Audio, electronic, visual, thermal, or similar information.
<b>H. Internet or Network Activity</b>	Browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.
<b>I. Professional or Employment information</b>	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, complaint records, and request for leave.
<b>J. Education information</b>	Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records, school name and date of graduation.
<b>K. Inferences drawn from other personal information and Consumer Profiles</b>	Profile reflecting a person’s preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, history of personal property, products or services purchased, obtained, or considered and inferences reflecting preferences and characteristics drawn from personal information to create a profile for servicing account, or for marketing.

**Categories of Sources from which Consumers’ Personal Information is Collected**

We obtain the categories of personal information and sensitive personal information listed above from one or more of the following categories of sources:

- From You, Your Authorized Agent, or Family Members. We may collect information directly from you, family members, or your authorized agent when you contact us by email, telephone or by other means. For example, when you provide us your name and Social Security number to open an account and become a Member. We also collect information indirectly from you or your authorized agent. For example, through information we collect from our Members in the course of providing services to them.

- From Social Media. We collect personal information that you choose to make public, including via social media. For example, we may collect information from your social media postings, to the extent you choose to make those postings publicly visible.
- From Our Website, Online and Mobile Banking, and Applications That You Access on Your Mobile Device. We collect certain information from your activity on our website, <https://www.orangecountyscu.org>, and your use of Orange County's Credit Union applications on your mobile device. We may collect your IP address, device and advertising identifiers, browser type, operating system, Internet service provider ("ISP"), the date and time of your visit, information about the links you click and pages you view on our website, and other technical communications information.
- Cookies and Other Online Tracking Technologies. We, or our service providers, contractors, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as providing an improved service and fraud prevention. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.  
 "Cookies" are small amounts of data a website can send to a visitor's web browser which can later be retrieved. They are often stored on the device you are using to recognize whether or not you have visited the site before. Cookies can be read by the website that "set" the cookie. We use cookies for administrative purposes, such as online banking session management, or in areas where you are able to customize the information you see. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience.  
 You may elect to set your web browser to inform you when cookies are set, prevent them from being set, or enable your web browser's "Do Not Track" signal or similar mechanism. However, if you elect to prevent cookies from being set or enable your web browser's "Do Not Track" signal or similar mechanism, some web banking functions may not work properly.  
 Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message—or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.
- Account Aggregators. Account aggregation services collect information from all of your accounts at financial institutions, brokerages, etc. and consolidate the information into one site for your convenience. In order for this to happen, you will have to provide a company with sensitive account information, personal identifiers and an access code or Personal Identification Number. By giving up your access code or PIN, you are authorizing that company to access your account. All transactions conducted by the account aggregator using an access code you provide to them are considered authorized by you.
- Service Providers, Contractors, and Third Parties. Generally referred to as vendors who obtain your personal information to provide services on OCCU's behalf for a business or operational purpose, or for a commercial purpose.
- Joint Marketing Partners. Businesses we have entered into agreements with to collaborate on marketing and promotion efforts.
- Government Entities and Other Publicly-Available Sources. For example, the Financial Crimes Enforcement Network (FinCEN) is a bureau of the United States Department of the Treasury that

collects and analyzes information about financial transactions in order to combat domestic and international money laundering, terrorist financing, and other financial crimes.

- Consumer Data Resellers. Businesses that assemble and merge information contained in the databases of consumer reporting agencies.
- Commercial Credit Reporting Agencies. Businesses that maintain historical credit information on individuals and businesses. They receive data from lenders and various other sources and supply credit reports and scores to financial institutions.

## **Purposes for Collecting and Using Personal Information and Sensitive Personal Information**

The categories of personal information and sensitive personal information listed above may be used for the business purposes and commercial purposes described below:

- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes, to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Debugging to identify and repair errors that impair existing intended functionality.
- IT operations which include management of communications systems, operation of IT security, and IT security audits.
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction.
- Fulfilling the reason for which the personal information was provided, such as using the personal information in your loan application to give you a loan.
- Provide you with information, products or services that you request from us.
- Performing services on behalf of OCCU, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of OCCU.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Provide you with email and SMS text alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, OCCU with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers.
- Testing, research and analysis for technological development and improvement of our products and services, development of new products and services, and demonstration.

- To improve our website, online banking, and mobile banking and presentation of the information.
- Health and safety assessments and record keeping in compliance with related operational and legal obligations.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by OCCU, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by OCCU.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.
- To protect the rights, property or safety of us, our employees, our Members or others.
- Investigations for detecting and preventing breaches of policy, and criminal offenses, in accordance with applicable law.
- Establishing, exercising, and defending legal rights.
- Risk Management, audit, compliance, control and other risk management activities.

## **Length of Time Personal Information will be Retained**

We will retain your personal information in line with our record retention policy and for the minimum period required by either contractual obligations, business need to provide the products and services reasonably expected by consumers, or statutory and regulatory requirements. The duration of the retention period is determined by a number of criteria including the nature of our relationship with you, the type of personal information, and the products and services the personal information relates to. We will retain your personal information for as long as we have an ongoing relationship with you. For example, if we provide a financial product or service to you we need to retain the personal information in connection with the lawful purposes set out in this Privacy Policy as they relate to the financial product or service.

In the event of a legal claim, we may continue to retain your personal information for such period as is necessary in connection with that legal claim. After this period, we will typically retain your personal information for any additional limitation period (i.e. any period during which a legal claim could be raised) plus two months after the end of the limitation period, in order to ensure that the personal information can be used in connection with any legal claim which may be brought. During the legal hold period we will restrict our processing of your personal information to the storage of, and maintaining the security of, the personal information, except to the extent that the personal information needs to be reviewed in connection with any legal claim, or any obligation under applicable law. Once we no longer need to retain your personal information, we will either:

- permanently delete or destroy the relevant personal information;
- archive your personal information so that it is beyond use; or
- deidentify the relevant personal information.

The Credit Union will not retain your personal information or sensitive personal information for each of the disclosed purposes for which the personal information was collected for longer than is reasonably necessary for that disclosed purpose, or for another disclosed purpose that is compatible with the

context in which the personal information was collected, and not further processed in a manner that is incompatible with those purposes.

## **Sharing of Personal Information**

We disclose your personal information to a third party for a business purpose or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to keep that personal information confidential and not to use it for any purpose except performing the contract. In the preceding 12 months, we have disclosed the following categories of personal information for a business or commercial purpose:

- Category A
- Category B
- Category C
- Category D
- Category E
- Category F
- Category G
- Category H
- Category I
- Category J
- Category K

## **The Categories of Third-Parties We Disclose Your Personal Information to For a Business or Commercial Purpose**

For each of the categories of personal disclosed for a business or commercial purpose, the categories of third parties to whom the information was disclosed include:

- Our third-party service providers.
- Other businesses to bring you improved service across our entire line of products and services, and to bring you co-branded services, products, or programs.
- Third parties that help us advertise products, services, or memberships with us to you.
- Third parties to whom you or your agents authorized us to disclose your personal information in connection with products and services we provide to you.
- Third parties in connection with corporate transactions, such as a sale of assets, consolidation, or merger of our financial institution, and
- Other third parties to comply with legal requirements such as demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property, or security of our Members, consumers, or third parties.

## **Changes to This California Consumer Privacy Act Privacy Policy**

OCCU may change or update this Privacy Policy from time to time. When we do, we will let you know by appropriate means, and will post the revised Privacy Policy on our website with a new “last updated” date. Any changes to this Privacy Policy will become effective when posted unless indicated otherwise. Your use of this website following these changes means that you accept the revised Privacy Policy.

\* Sending personal information and sensitive personal information through unsecure email may expose such information to being intercepted by third parties. You should consult your email service provider to learn your options for protecting your personal information from unauthorized or illegal access, destruction, use, modification, or disclosure.

Date this Privacy Policy was last updated: January 1, 2024