

# California Consumer Privacy Act Disclosure

Updated 1/1/2020

## **Purpose**

This California Consumer Privacy Act Disclosure explains how Corporate America Family Credit Union (CAFCU) collects, uses, and discloses the personal information of California consumers covered by the California Consumer Protection Act of 2018 (CCPA).

As used in this notice, the words “we”, “us”, and “our” mean CAFCU and the words “you”, “your”, and “consumer” mean California consumers as defined in the CCPA.

Please read this notice carefully to understand our policies and practices regarding your personal information and how we will treat it. This notice is provided pursuant to the CCPA.

## **Applicability**

This Disclosure applies to California consumers. Under the CCPA, a ‘consumer’ is defined as a natural person who is a California resident. Any terms defined in the CCPA have the same meaning when used in this notice.

The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (GLBA). CAFCU’s GLBA Privacy Notice can be found at [www.cafcu.org/about-us/privacy-policy](http://www.cafcu.org/about-us/privacy-policy). Furthermore, the CCPA shall not restrict CAFCU’s ability to comply with any federal, state, or local laws.

The specific personal information of California consumers that we collect and disclose will vary based on our relationship or interaction with that individual. For example, this notice does not apply to information that we collect about California consumers who apply for or obtain our financial products and services for personal, family, or household purposes.

## **Collection of Personal Information**

As a financial institution, CAFCU collects personal information of California consumers that identifies, relates to, or describes a particular consumer or household. The following table displays the 11 categories of personal information as defined in the CCPA and indicates whether CAFCU collects any information from each individual category. CAFCU has collected the following categories of personal information from consumers within the last 12 months:

CATEGORY	EXAMPLES	COLLECTED BY CAFUCU?
A. Identifiers.	Name, postal address, Social Security number.	YES
B. Personal information categories listed in the California Customer Records statute.	Name, signature, social security number, bank account number, or any other financial information. Some personal information in this category may overlap with other categories.	YES
C. Characteristics of protected classifications under California or federal law.	Age, race, gender, and marital status.	YES
D. Commercial Information.	Transaction information and purchase history.	YES
E. Biometric Information.	Genetic, physiological, behavioral, and biological characteristics.	NO
F. Internet or other electronic network activity information.	Browsing history and interactions with a website.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio and visual information such as call and video recordings.	YES
I. Professional or employment-related information.	Current or past job history and job application records.	YES
J. Non-public education information.	Student records such as grades, transcripts, and student schedules.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and/or aptitudes.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, information you provide to us when using any of CAFUCU's products or services or when applying with CAFUCU for a loan or other account.
- Indirectly from you. For example, information about you that we collect in the course of providing services to you.
- From third parties and service providers that interact with us in connection with the services we perform. For example, information we receive from a credit reporting agency when you apply for a loan with CAFUCU.
- From our Website and Mobile Application.

## **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which you provided the information. For example, when you apply for membership, open an account, or apply for a loan.
- To provide you with services that you request from us. For example, when you deposit money, when you use your CAFCU credit or debit card, or when you pay your bills via our online banking site.
- To provide you with email alerts, marketing information, and other notices concerning our products and services, or other news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For research, analysis, and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our members, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Sales of Personal Information**

In the past 12 months, CAFCU has not sold personal information subject to the CCPA for monetary or other valuable consideration, including personal information of minors under the age of 16. CAFCU does not and will not sell the personal information of any consumer regardless of age.

## **Your Rights under the CCPA**

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights.

### *(1) Access to Specific Information Rights (Right to Know)*

You have the right to request that we disclose certain information to you about our collection and use of your personal information currently and over the past 12 months. Once we receive your request and verify your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.

- The specific pieces of personal information we collected about you.
- If we disclosed your personal information to a service provider for a business purpose, we will:
  - identify the personal information categories that each service provider was provided

*(2) Deletion Request Rights (Right to Delete)*

You have the right to request that we delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exemption applies.

*(3) Be free from unlawful discrimination for exercising your rights under the CCPA (Right to Non-Discrimination)*

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates 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 may receive a different price or rate for goods or services or a different level or quality of goods or services.

We do not offer certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels.

In some cases, we may not be able to honor your access or deletion request. For example, we will not honor your request if we cannot verify your identity. Additionally, we will not honor your request where an exception applies, such as where your personal information that we maintain about you is not subject to the CCPA's access or deletion rights. We will advise you in our response if we are not able to honor your request due to an exemption provided by the CCPA. We will not provide personal information such as social security numbers, driver's license numbers, government issued identification numbers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft, fraud, or unreasonable risk to data or systems and network security.

**How to Exercise Your Rights**

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 800-359-1939
- Visiting [www.cafcu.org/CCPA](http://www.cafcu.org/CCPA)
- Visiting our Santa Clara branch located at: 2350 Mission College Blvd., Suite 100, Santa Clara, CA 95054

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

#### *Response Timing and Format*

We strive to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason for the extension period in writing. We will deliver our written response to you by mail or via secure email. Any disclosures we provide will cover the 12-month period preceding the receipt of the verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### *Right to Opt-Out of Personal Information Sales*

CAFCU does not and will not sell personal information. Given this practice, CAFCU is exempt from providing a notice of right to opt-out per the CCPA and its implementing regulations.

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

If we make material changes to how we treat consumers' personal information, we will update this Disclosure and post the revised version on this page with a new "Updated" date.

#### **Questions**

You may contact us with questions about this CCPA Disclosure by:

- (1) Writing us at:

*Corporate America Family Credit Union*

*Attn: Risk Management*

*2075 Big Timber Road*

*Elgin, IL 60123*

- (2) Emailing us at: [risk.management@cafcu.org](mailto:risk.management@cafcu.org)