

# PRIVACY POLICY FOR CALIFORNIA RESIDENTS

This **Privacy Policy for California Residents** supplements the information contained in Sierra Central Credit Union's https://www.sierracentral.com/privacy-policy and applies solely to all visitors, users, and others, as well as owners, directors, officers and employees of companies that do business with the Credit Union, who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy rights Act of 2020 (CCPA), and its implementing regulations, and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy **does not apply** to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. Please see our SCCU Employee Privacy Policy located in Human Resources.

Also, this Policy does not apply to information collected from California residents who apply for or obtain our financial products and services for personal, family, or household purposes as this information is subject to the Gramm-Leach-Bliley Act (GLBA), Fair Credit Reporting Act (FCRA), or California Financial Information Privacy Act (FIPA) and is excluded from the CCPA's scope. For more information on how we collect, disclose, and secure this information, please refer to our https://www/sierracentral.com/privacy-policy and click on "Download the Sierra Central Credit Union Privacy Policy".

### **INFORMATION WE COLLECT**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information.

We retain this information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below describes the categories of personal information we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Category of Personal Information Collected	Business Purpose for Collection	Sold or Shared	Retention
Identifiers  (A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.)	<ul> <li>Performing services such as maintaining or servicing accounts</li> <li>Providing member service</li> <li>Processing transactions</li> <li>Verifying member information</li> <li>Providing financing</li> <li>Preventing and responding to security incidents or illegal activity</li> <li>Verifying the quality of our products and services</li> <li>Providing information to you about our products and services</li> </ul>	No	Until no longer needed to comply with our legal obligations.
California Customer Records personal information (A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.)	<ul> <li>Performing services such as maintaining or servicing accounts</li> <li>Providing member service</li> <li>Processing transactions</li> <li>Verifying member information</li> <li>Assessing your qualifications for a financial service or product</li> <li>providing financing</li> <li>Preventing and responding to security incidents or illegal activity</li> <li>Verifying the quality of our products and services</li> <li>Providing information to you about our products and services</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Protected classification characteristics under California or federal law (Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity,	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Undertaking research and development</li> </ul>	No	Until no longer needed to comply with our legal obligations.

gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).  Commercial information (Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)	<ul> <li>Verifying the quality or safety of our products and services</li> <li>Complying with equal opportunity lending laws</li> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Providing information to you on our products and services</li> <li>Assessing qualifications</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Geolocation data (Physical location or movements.)	for a product or service  Performing services such as maintaining your account  Preventing and responding to security incidents and other illegal activity  Advertising or marketing to you	No	Until no longer needed to comply with our legal obligations.
Sensory data (Audio, electronic, visual, thermal, olfactory, or similar information.)	<ul> <li>Performing Services such as maintaining your account</li> <li>Preventing and responding to security incidents and other illegal activity</li> <li>Verifying the quality or safety of our products and services</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Professional or employment-related information (Current or past job history or performance evaluations.)	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Assessing your qualifications for a product or service</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	No	Until no longer needed to comply with our legal obligations.

The table below describes the categories of **sensitive personal information** we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Category of Sensitive Personal Information	Business Purpose for Collection	Sold or Shared	Retention
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Precise geolocation	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Racial or ethnic origin	<ul> <li>Comply with equal opportunity lending laws</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Union membership	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Assessing qualifications for a product or service</li> </ul>	No	Until no longer needed to comply with our legal obligations.
Mail, email, or text messages contents not directed to us	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Assessing qualifications for a product or service</li> </ul>	No	Until no longer needed to comply with our legal obligations.

# SOURCES OF PERSONAL INFORMATION

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

- Directly from you or your representatives
- Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities
- Public Record Sources (Federal, State or Local Government Sources)
- Information from our Affiliates
- Website/Mobile App Activity
- Information from member directed persons or entities or institutions representing a member/prospect
- Information from business members about individuals associated with the business member (e.g., an employee or board member)

#### **USE OF PERSONAL INFORMATION**

We may use or disclose the personal information we collect for one or more of the following purposes, but any sensitive personal information we collect about the consumers is used or disclosed only for the purposes set forth in Section 7027(m) of the California Code of Regulations and not for inferring characteristics about the consumer:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request or ask a question about our financial products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to apply for a financial product or enroll in a service, we will use that information to complete your request.
- To provide, support, personalize, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Website, financial products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- 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.

## SHARING OR SELLING PERSONAL INFORMATION

As used in this policy, and as defined in the CCPA, "share" means communicating a consumer's personal information to a third party for cross-context behavioral advertising. We do not share or sell your personal information. In the preceding twelve (12) months, the Credit Union has not shared or sold personal information for cross-context behavioral advertising.

# DISCLOSING PERSONAL INFORMATION TO THIRD PARTIES FOR BUSINESS PURPOSES

We may disclose your personal information to a third party for a business purpose. In the preceding twelve (12) months, Credit Union has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below].

Personal Information		
Category	Business Purpose	Third Party Categories
Identifiers	Performing services on behalf of the credit union including:  • Maintaining or servicing accounts  • Providing member service  • Processing a transactions  • Verifying member information  • Preventing and responding to security incidents or illegal activity  • Verifying the quality of our products and services  • Providing information to you about our products and services	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
California Customer Records personal information categories	Performing services on behalf of the credit union including:  • Maintaining or servicing accounts  • Providing member service  • Processing a transactions  • Verifying member information,  • Providing financing  • Preventing and responding to security incidents or illegal activity  • Verifying the quality of our products and services  • Providing information to you about our products and services	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
Protected classification characteristics under California or federal law	Performing services on behalf of the credit union including:  • Maintaining or servicing accounts  • Providing member service  • Processing a transactions	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> </ul>

	<ul> <li>Verifying member information</li> <li>Providing financing</li> <li>Preventing and responding to security incidents or illegal activity</li> <li>Verifying the quality of our products and services</li> <li>Providing information to you about our products and services</li> </ul>	Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship
Commercial information	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing transactions</li> <li>Providing information to you on our products and services</li> <li>Assessing qualifications for a product or service</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
Internet or other similar network activity	<ul> <li>Track website activity to improve website experience</li> </ul>	Third-party vendor business partners, such as verification services, and analytic providers
Geolocation data	<ul> <li>Performing services such as maintaining your account</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
Sensory data	<ul> <li>Performing Services such as maintaining your account</li> <li>Preventing and responding to security incidents and other illegal activity</li> <li>Verifying the quality or safety of our products and services</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related</li> </ul>

		product or service, apply for a scholarship
Professional or employment-related information	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing a transaction</li> <li>Assessing your qualifications for a product or service</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
Complete account access credentials	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing a transaction</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service</li> </ul>
Precise geolocation	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing a transaction</li> <li>Preventing and responding to security incidents and other illegal activity</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>
Racial or ethnic origin	Comply with equal opportunity lending laws	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service</li> </ul>

Union membership	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing a transaction</li> <li>Assessing qualifications for a product or service</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service</li> </ul>
Mail, email, or text messages contents not directed to us	<ul> <li>Performing services such as maintaining your account</li> <li>Providing customer service</li> <li>Processing a transaction</li> <li>Assessing qualifications for a product or service</li> </ul>	<ul> <li>Third-party vendor business partners, such as verification services, and analytic providers</li> <li>Public Records</li> <li>Government entities</li> <li>Directly from you when you provide information to us to apply for a loan, open an account, or other related product or service, apply for a scholarship</li> </ul>

### YOUR RIGHTS & CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. This section describes your CCPA rights and explains how to exercise those rights.

#### Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights ), depending on the information you request, 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, selling or sharing that personal information.
- The categories of third parties, if any, to whom we make available that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

#### Riaht to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request to see if an exception allowing us to

retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractor(s) to:

- 1. Complete the transaction for which we collected the personal information, provide a financial product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- 3. Debug products to identify and repair errors that impair existing intended functionality.
- 4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- 7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 8. Comply with a legal obligation.
- 9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors and other third parties, if any, to take similar action.

## Right to Correct

You have the right to request that we correct any inaccurate personal information that we maintain about you (the "right to correct"). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request correct the inaccurate information.

# Right to Opt-out of Sale or Sharing

We do not sell or share your personal information. Therefore, we are not required to provide you with the right to opt-out of sale or sharing.

### Right to Limit

We only use a consumer's sensitive personal information for the purposes identified in Section 7027(m) of the California Code of Regulations. Therefore, we are not required to give you notice of the right to limit the use of sensitive personal information or give you the opportunity to request that such information be limited.

#### Right to be Free from 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 financial products or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of financial products or services.
- Suggest that you may receive a different price or rate for financial products or services or a different level or quality of financial products or services.

# Exercising Your CCPA Rights

To exercise your rights to know, delete or correct described above, please submit a request by either:

- Calling us at 800-222-7228.
- Visiting www.sierracentral.com and filling out a webform.
- Mail to 1351 Harter Parkway Yuba City, CA 95993. Attn: Compliance Department
- Visit any of our Sierra Central Credit Union branch locations.

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information. You may do so by any of the methods described under "Exercising Your CCPA Rights".

You may also make a request to know, delete, or correct on behalf of your child by any of the methods described under "Exercising our CCPA Rights".

You may only submit a request to know twice within a 12-month period. Your request to know, delete, or correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
  - If you submit your request in person, we may ask to see a current government issued photo ID such as a driver's license, passport, or military ID. If you make your request by phone, mail, or via our online portal, we may ask for information that allows us to verify your identity by comparing the information you provide against information in our records.
- When an authorized agent submits a request on your behalf, we may require proof that you gave the agent signed permission to submit the request, such as a power of attorney or other signed authorization. If your agent does not have a valid power of attorney, we may also require that you verify your identity directly with us and confirm directly with us that you provided the agent permission to submit the request on your behalf.
  - A parent or legal guardian can submit a request on behalf of their minor child. If the request is submitted in person, we may ask to see your current government issued photo ID such as a driver's license, passport, or military ID. If you make the request via phone, mail, or via our online portal, we may ask for information that allows us to verify you are the minor child's parent or legal guardian, and verify your identity by comparing the information you provide against information in our records.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale or sharing opt-out or opt-in rights, see Personal Information Sales/Sharing Opt-Out and Opt-In Rights.

For instructions on exercising your right to limit use or disclosure of sensitive personal information, see Right to Limit the Use of Sensitive Personal Information.

# Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact the credit union by phone at 800-222-7228.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding receipt of your request. For a request to know, you may request information collected beyond the 12-month period provided the information was collected on or after January 1, 2022, and providing the information would not be impossible or involve disproportionate effort. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically via the email address or physical address provided with your request.

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.

# CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

# **CONTACT INFORMATION**

If you have any questions or comments about this notice, the ways in which Sierra Central Credit Union collects and uses your information described here and in our Sierra Central Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800-222-7228

Website: www.sierracentral.com

Postal Address:

Sierra Central Credit Union Attn: Compliance Department

1351 Harter Parkway Yuba City Ca, 95993

If you need to access this Policy in an alternative format due to having a disability, please contact 800-222-7228.

Date Last Updated: [7/1/23]

