

This document consists of the following:

- Orange County's Credit Union Online Privacy Policy
- Orange County's Credit Union California Consumer Privacy Act Disclosure

ONLINE PRIVACY POLICY

This Policy is Effective as of: April 6, 2021

At Orange County's Credit Union ("Credit Union", "we", "our", "us"), we respect your right to privacy and understand the importance of maintaining the security of your personal information in your dealings with us. We strive to keep the information you share with us secure and confidential. This Online Privacy Policy ("Policy") only relates to the information we collect online through www.orangecountyscu.org ("Website, Site"), and our Mobile Banking Application ("Application").

Security and Confidentiality

Keeping your financial information secure is a top priority. Our associates only access your information when necessary to complete a transaction you request, respond to an inquiry, maintain your account, or as otherwise required or permitted by law. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your non- public personal information. Our staff is trained to comply with our established security procedures.

Security and Stability

The Application collects and evaluates user credentials, device, and network information in order to authenticate the user, enable features, prevent fraud, implement security measures, ensure server up-time, minimize Application crashes, improve scalability and performance, or perform customer support.

Information We Collect About You

When you visit our Site, inquire about our products or services, completed any of our forms, or when opening an account, you may be asked to provide information about you that is personally identifiable ("Personal Information"). This may include:

- Your first and last name;
- A home or physical address (including street name or name of a city or town);
- An e-mail address;
- A telephone number;
- A tax identification number; and
- Any other identifier that permits physical or online contact with you.

In addition, we may collect and store the following information about your visit: the IP address from which you access our Site; the type of browser and operating system used to access our Site; the date and time you access our Site; the Internet address of the site from which you linked directly to our Site; and the pages you visit and the information you request. We collect information about you that is necessary to provide the information, products or services. In order to analyze and meet your financial needs, we may also use other information about you that is publicly available, such as information from credit reports, public records or market research.

Google Analytics

We use Google Analytics to understand how visitors engage with our Website. For information on how Google uses the data it collects, and how to control the information sent to Google, please visit [Google's Privacy & Terms](#).

Google AdWords Across the Web

We use a third party for online advertising. "Google Ads Across the Web" uses remarketing cookies to serve ads based on someone's past visits to our Website. To opt out of Google's use of cookies, please visit [Google's Ads Settings](#).

From Our Website and Application that You Access

Analytic data is captured to evaluate user's behavior, including to understand the effectiveness of existing product features, plan new features, or measure audience size or characteristics.

Cookies and "Do Not Track" Mechanisms

We use a "cookies" for the purpose of providing an improved service. A cookie is a small piece of data given to your browser by a website, which can later be retrieved. A cookie is a way for website to recognize whether or not you have visited the site before. The cookie 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. The use of cookies makes your online experience easier and more personal.

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.

Affiliated Companies With Whom Orange County's Credit Union May Share Information

We limit our information sharing practices to those companies with whom we have agreements to provide you a wide variety of financial products and services such as insurance and securities firms, or those that assist the credit union in providing these services - for example, our ATM Network, Mortgage Company and Shared Service Centers. Those companies agree not to disclose the information received by the Credit Union. We may also share information with our affiliated Credit Union Service Organization in order to make other services available to you. In certain instances, you have the right to tell us not to share information with these entities.

Account Aggregators

Many companies are offering account aggregation services that 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.

Accurate Information

We endeavor to keep our information about your accounts accurate and current. If you find any problems with any of your statements or other credit union information, please contact us in writing at Orange County's Credit Union, PO Box 11777, Santa Ana, CA 92711-1777 or by phone at (888) 354-6228, during regular business hours. We will research your request and correct any inaccuracies.

Children's Online Privacy Protection Act ("COPPA") Disclosure

The Children's Online Privacy Protection Act of 1998 ("COPPA") restricts the collection, use, or disclosure of Personal Information from and about children under the age of 13 on the internet. Orange County's Credit Union is committed to protecting the online privacy of the children who visit our Site and complying with COPPA.

In general, our Site is not directed to children under the age of 13 and we request that children under the age of 13 not provide Personal Information through the Site. We may, however, elect to provide contest information on our Site for our youth Members, which includes children under the age of thirteen (13). Youth Members who identify themselves to be under the age of thirteen (13) will not be permitted to submit any Personal Information on our contest Site.

We may collect information on domain names, dates and times of visits, and number of page views. This information contains no Personal Information and will only be used to continue to improve the overall value of our Site. We do not knowingly collect, use, or disclose Personal Information from children under 13 on the internet without prior parental consent. Visit the Federal Trade Commission website for more information about COPPA.

Updates to this Policy

This Policy is subject to change at any time. Please review it periodically. Orange County's Credit Union will revise the "Effective Date" stated at the top of this Policy at the time any material changes to the Policy are made. Your use of the Site following these changes means that you accept the revised Policy.

Contact Us

If you have any questions regarding this Policy call us at (888) 354-6228 or write to us at:

Orange County's Credit Union
P.O. Box 11777
Santa Ana, CA 92711-1777



California Consumer Privacy Act Disclosure

Effective January 1, 2020

Privacy of personal information is important to Orange County’s Credit Union (“OCCU”). OCCU does not sell your personal information, including personal information of minors under the age of 16, and is committed to keeping your information secure. This California Consumer Privacy Act Disclosure (the “Disclosure”) explains how OCCU collects, uses, and discloses personal information relating to California residents that is subject to the California Consumer Privacy Act of 2018.

This California Consumer Privacy Act Disclosure (“CCPA”) supplements the Online Privacy Policy, and other relevant privacy policies. This Disclosure applies solely to California consumers and addresses personal information collected online and offline.

Keeping personal information secure is a critical important priority. Consistent with our obligations under applicable laws and regulations, physical, technical, electronic, procedural and organizational safeguards and security measures that are designed and maintained to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Personal Information

CCPA defines “Personal information” as information that identifies, relates to, describes, is 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.

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

Categories of Personal Information

Collection

In the preceding twelve (12) months OCCU may have collected the following categories of personal information from California consumers:

Categories of Personal Information	Examples
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers

Categories of Personal Information	Examples
Customer Records Information	Personal information described in subdivision (e) of Section 1798.80 of the CCPA such as signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
Protected Classifications	Characteristics of protected classifications under California or federal law, such as race, color, national origin, age, sex, gender, and military and veteran status
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
Biometric Information	Fingerprints, voice recordings
Internet or Network Activity	Browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement
Geolocation Data	Device physical location
Sensory Information	Audio, electronic, visual or similar information such as call and video recordings
Professional or Employment information	Work history and prior employer
Education information	School name and date of graduation
Inferences	Inferences drawn from any of the information identified above to create a profile, for example, reflecting an individual’s preferences and characteristics

Sources

OCCU may have collected personal information about California consumers from the following categories of sources:

- Directly from you
- From your devices, such as when you visit our websites, online and mobile applications
- Other individuals, such as authorized agents or family members
- Vendors who provide services on OCCU’s behalf
- Joint marketing partners
- Social Networks
- Government entities and other publicly-available sources
- Consumer data resellers

Use

Categories of personal information listed above may be used for the purposes described in our Privacy Policies. In addition, OCCU use these categories of personal information for certain business purposes specified in the CCPA, as described below:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services

- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by OCCU

Sharing

OCCU may have disclosed personal information of consumers to the following categories of third parties for business purposes as defined by CCPA:

- Vendors who provide services on OCCU's behalf
- Professional services organizations, such as auditors and law firms
- Joint marketing partners
- Business partners
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating Systems and platforms
- Social networks
- Consumer data resellers

California Consumer Rights Under CCPA

The CCPA provides California consumers with specific rights regarding personal information. These rights are subject to certain exceptions, including for example, if the personal information was collected pursuant to Gramm-Leach-Bliley. Our response to your exercise of rights may be limited as permitted under law.

Specifically, California residents have the right under CCPA to request from OCCU the following covering 12 months preceding the request:

1. **Right to Know:** Request that OCCU disclose to you certain information about OCCU's collection, use and disclosure of your personal information within the preceding 12 months, including:
 - Specific pieces of personal information that a business has about the consumer;
 - Categories of personal information it has collected about the consumer;
 - Categories of sources from which the personal information is collected;
 - Categories of personal information that the business disclosed for a business purpose about the consumer;

- Categories of third parties to whom the personal information was disclosed for a business purpose; and
 - The business or commercial purpose for collecting personal information
2. Right to Delete: Request OCCU delete Personal Information collected from you, unless the CCPA recognizes an exception
 3. Right to Non-Discriminate: To be free from unlawful discrimination for exercising your rights under the CCPA

OCCU will acknowledge receipt of CCPA request 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 will require additional information to verify your identity including a signed and notarized declaration, under penalty of perjury, that you are the individual whose information is being requested. Requests for deletion require a two-step confirmation process. 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 within 45 days pursuant to the CCPA. 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.

How to Exercise Your Rights

California residents, may submit a CCPA request by:

- Visiting a Branch
 - Calling (888) 354-6228
- For TDD hearing-impaired assistance through Relay Service, dial 7-1-1; provide the Relay Operator with 1-800-238-4486 or Teletypewriter (TTY) 1-800-826-7345

Changes to This California Consumer Privacy Act Disclosure

OCCU may change or update this Disclosure from time to time. When there is a change or update OCCU will post the revised Disclosure. Your use of this Site following these changes means that you accept the revised Policy.

Publish Date: January 28, 2020