



# 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

<b>Categories of Personal Information</b>	<b>Examples</b>
<b>Customer Records Information</b>	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
<b>Protected Classifications</b>	Characteristics of protected classifications under California or federal law, such as race, color, national origin, age, sex, gender, and military and veteran status
<b>Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
<b>Biometric Information</b>	Fingerprints, voice recordings
<b>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>Geolocation Data</b>	Device physical location
<b>Sensory Information</b>	Audio, electronic, visual or similar information such as call and video recordings
<b>Professional or Employment information</b>	Work history and prior employer
<b>Education information</b>	School name and date of graduation
<b>Inferences</b>	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.

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