Valley First
CREDIT UNION

CCPA NOTICE AT COLLECTION

Valley First Federal Credit Union (together with its subsidiaries and affiliates, also referred to as "we," "us," or "our" herein) is providing this notice pursuant to the California Consumer Privacy Act ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this notice. This notice provides a summary of how we collect, use and share your personal information.

Application of this Notice

This notice applies generally to natural residents of California from whom we collect personal information from our interactions, whether such interactions occur online, on our mobile application, on our premises, or other offline interactions.

If you are a natural resident of California applying for a job with us, the careers page on our website where your personal information will be taken through a job application is hosted by a third party. We do not operate this site and are not responsible for the content of the site or the third-party's privacy and security policies, which may differ from ours. Once we receive your job application, this notice will apply to how we further collect, use, and share your personal information that you provided in connection with your job application.

This notice also applies to you if you are a natural resident of California and applying for a business account or business loan with us in your capacity as a sole proprietor of a business or an owner, officer, director, officer, employee, or authorized agent of a business.

Below are the categories of personal information we collect and the purposes for which we intend to use this information.

Categories Information We Collect

In the preceding 12-months, we have collected the following categories of personal information (please note that some categories overlap):

- ***Identifiers***, such as name, address, social security number, driver's license number, email address or other similar identifiers.

- ***Personal information categories described in Cal. Civ. Code § 1798.80(e),*** such as signatures, physical characteristics, bank account number, credit card number, and other financial information.

- ***Protected traits under state or federal law,*** such as age, race, color, citizenship, religion, sexual orientation, marital status and medical condition.

- ***Commercial information,*** such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- ***Biometric information,*** such as fingerprints and voiceprints.

- ***Geolocation data,*** such as location information associated with your IP address or

derived through Wi-FI triangulation or precise geolocation from GPS-based functionality on your mobile device.

- ***Sensory data,*** such as audio, electronic, visual or similar information.

- ***Professional or employment related information,*** such as current or past job history, emergency contact information, and personal information needed from you or another person related to you (e.g., your spouse and dependents) to administer job-related benefits.

- ***Non-public education information*****,** such as college transcripts and letters of recommendation.

- ***Inferences drawn from other personal information,*** such as a profile reflecting a person's preferences, characteristics, behavior, intelligence, and aptitude.

- ***Sensitive personal information,*** which includes the following information under the CCPA: 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 credentials 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 business is the intended recipient of the communication; A consumer's genetic data; A consumer's neural 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 of consumers that the business has actual knowledge are less than 16 years of age.

Personal information for purposes of the CCPA does <u>not</u> include:

- Publicly available information.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like personal information covered by certain financial sector laws, such as the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA).

Use of Personal Information

We may use or disclose the personal information we collect to:

- To provide you with information, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- Recruit and evaluate job applicants and candidates for employment and related uses such as:
    - Timekeeping, payroll, and expense report administration;

- Employee benefits administration;
- Employee training and development requirements;
- Reaching your emergency contacts when needed;
- Worker's compensation claims management;
- Employee job performance, including performance reviews, investigations, promotions, discipline, and termination; and
- Other human resource purposes.

- To evaluate your application for membership and loans with us.
- To sell all or part of a loan to which you are obligated as borrower, guarantor, pledgor of collateral or you are a spouse of such party.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees or others.
- To prevent, detect and investigate security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- 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.
- Advertising our products and services to you.
- Exercise or defend our legal rights and that of our employees, affiliates, customers, contractors, and agents.
- Enabling or effecting, directly or indirectly, a commercial transaction.
- To comply with all applicable laws and regulations.
- For other lawful purposes.

Selling and Sharing Personal Information for Cross-Context Behavioral Advertising

The CCPA, provides California residents with the right to opt out of the sale or sharing of their personal information.

The CCPA defines "sale" more broadly than the term is commonly understood. Under the CCPA, a "sale" means the disclosure of personal information to a third party for monetary or other valuable consideration. However, disclosures of personal information to our service providers or contractors are not considered a "sale" when we have a written agreement in place that meets the requirements of the CCPA.

We do not sell your personal information for monetary consideration. Nevertheless, our sharing of personal information with third-parties for purposes of cross-context behavioral advertising may be considered a "sale" or "sharing" under the CCPA.

You may opt out of the sale or sharing of your personal information for cross-context behavioral advertising through the "**Do Not Sell or Share My Personal Information**" link on our website or mobile application. In addition, if you enable opt-out preference signals such as Global Privacy

Control (“GPC”) in a particular web browser, we will automatically honor that signal as a request to opt out of the sale or sharing of your personal information for cross-context behavioral advertising when you access our website using that browser. Please note that GPC signals are browser-specific and must be enabled separately on each browser or device; enabling GPC in one browser will not apply to other browsers or devices you may use.

Retention of Personal Information

The criteria we will use to determine the period of time that we will retain the categories personal information described above depends on our relationship with you and on the following criteria:

- **Laws and regulations**. We are a regulated financial institution that is subject to laws and regulations governing our retention of personal information of our members, applicants for credit union membership, loans and other financial products and services. We are also an employer and, thus, we are subject to labor laws governing how long we must retain information about applicants for employment and current and former employees. Therefore, applicable laws and regulations will govern how long we retain your personal information.

- **Contracts**. We must also retain information for as long as necessary to comply with our contractual duty to you as well as our contractual obligations with our service providers, contractors and other third-parties.

- **Assert and defend against legal actions**. We may retain your personal information for such period as we may need to assert and defend against potential legal actions.

Contact Information

If you have any questions or comments about this notice, please do not hesitate to contact us at: (877) 549-4567 or email us at mbrserv@valleyfirstcu.org. Please visit our CCPA Privacy Policy on our website for more information about the ways in which we collect and use your personal information and your choices and rights regarding such use under California law.