



Privacy Notice for California Residents

Effective Date: July 1, 2020

This **Privacy Notice for California Residents** supplements the information contained in [First Financial Credit Union's General Privacy Policy](https://ffcu.org/privacy) located at ffcu.org/privacy. This Privacy Policy for California Residents applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). The Credit Union ("we," "us," or "our") has adopted this Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Where noted in this Notice, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("**B2B personal information**") from some its requirements.

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.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from California consumers within the last twelve (12) months:

Category	Examples	Collected
1. <i>Identifiers.</i>	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.	YES

Category	Examples	Collected
2. <i>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</i>	<p>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.</p> <p>Some personal information included in this category may overlap with other categories.</p>	YES
3. <i>Protected classification characteristics under California or federal law.</i>	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, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
4. <i>Commercial information.</i>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
5. <i>Biometric information.</i>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
6. <i>Internet or other similar network activity.</i>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
7. <i>Geolocation data.</i>	Physical location or movements.	YES
8. <i>Sensory data.</i>	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
9. <i>Professional or employment-related information.</i>	Current or past job history or performance evaluations.	YES
10. <i>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</i>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

Category	Examples	Collected
11. <i>Inferences drawn from other personal information.</i>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

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

- Directly from you. For example, from forms you complete, when you perform transactions, or when you purchase products or services.
- Indirectly from you. For example, from observing your actions on our Website, when you use your debit or credit card, when you make deposits or withdrawals to/from your accounts, or when you pay your bills.
- We also receive information from third parties, such as credit reporting agencies, government agencies, law enforcement authorities, or service providers.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information with us to request a rate quote, to ask a question about our products or services, or to process a transaction, we will use that personal information to respond to your request or question and to process your transactions, accordingly. We may also save your information to facilitate new transactions in the future. We also use your information for customer service and collections purposes and for ongoing account maintenance purposes, such as providing account statements, providing access to online banking, and providing account notifications.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, 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 personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To prevent fraud by monitoring activity to detect, investigate, and prevent potentially fraudulent transactions and other illegal activities, as well as to protect the rights and property of the Credit Union and our members;

- 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.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a liquidation or similar proceeding, in which personal information held by us about our Website users/consumers is among the assets transferred.
- To support our operations and to comply with applicable legal or regulatory requirements.
- To communicate with you via any means (including email, telephone, text message, or in person) about products, services, and events offered by the Credit Union and others, as well as to provide news and information we think will be of interest to you.
- To respond to your comments, questions, and customer service requests, as well as to send you support notices, updates, security alerts, and administrative messages (such as changes to our terms, conditions, and policies).
- To monitor and analyze trends, usage, and activities in connection with our products and services.
- To audit the quality and efficacy of our work for compliance, controls, and other risk management.
- To improve our products and services by identifying issues with existing products and services, enhancing existing products and services, and creating new products and services.

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 Personal Information

We may disclose your personal information for a business purpose [or sell your personal information to a third party, subject to your right to opt-out of those sales (see Personal Information Sales Opt-Out and Opt-In 0)]. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

Disclosure or Sale of Personal Information

In the preceding twelve (12) months, the Credit Union has disclosed for a business purpose [or sold] the following categories of personal information:

- Identifiers.
- California Consumer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Biometric information.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.
- Non-public education information.
- Inferences drawn from other personal information.

During the previous 12 months, the Credit Union has disclosed for a business purpose [or sold] your personal information to the following categories of third parties: [Credit Union to modify annually as applicable]

- Service providers, including statement printers, and mailing houses.
- Outside companies or organizations that host, maintain, manage, or provide other services to us in relation to our products and services.
- Third parties that provide financial products and services to our members such as our card processors, online banking provider, and bill pay provider.
- Companies related by common ownership or control. These companies can be financial and nonfinancial companies. The Credit Union's affiliates include financial companies such as [insert name of affiliates].
- Government agencies, which include public authorities and law enforcement agencies, to respond to a lawful request, or to provide information we believe is important or required under applicable law.
- For other legal reasons, such as to monitor compliance with and to enforce our terms and conditions; to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others; to protect against potential or actual fraud, money laundering, terrorism, or other illegal activity; and for risk management purposes.
- We may also share information with outside accountants, auditors, lawyers, and other outside professional advisors to the Credit Union, subject to a requirement that such advisors keep your information confidential.
- Outside companies or organizations, including credit bureaus and other consumer reporting agencies, for routine and required reporting.
- Mortgage companies, securities broker-dealers, insurance companies, and direct marketing companies.

The Credit Union does not have actual knowledge that it sells the personal information of minors under 16 years of age.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access and Deletion), 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 or selling 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 sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 1. Sales, identifying the personal information categories that each category of recipient purchased; and
 2. Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We shall not disclose, in response to a request to know, a consumer's Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. We shall, however, inform you with sufficient particularity if we have collected that type of information. For example, we may respond that we collected "unique biometric data including a fingerprint scan" without disclosing the actual fingerprint scan data.

If we deny your verified request to know specific pieces of personal information, in whole or in part, because of a conflict with federal or state law, or an exception to the CCPA, we will inform you and explain the basis for the denial, unless prohibited from doing so by law. If the request is denied only in part, we will disclose the other information sought by you.

We do not provide these access rights for B2B personal information.

Deletion Request Rights

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. Once we receive and confirm your verifiable consumer request (see Exercising Access and Deletion 0), we will delete (and direct

our service providers to delete) your personal information from our records, unless an exception applies.

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

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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.

If we comply with your request, we will maintain a record of the request as required by law.

In cases where we deny a request to delete, we will do all of the following:

1. Inform you that we will not comply with your request and describe the basis for the denial, including any conflict with federal or state law, or exception to the CCPA, unless prohibited from doing so by law statutory and regulatory exception therefor;
2. Delete your personal information that is not subject to the exception; and
3. Not use your personal information retained for any other purpose than provided for by that exception.

If we store any personal information on archived or backup systems, we may delay compliance with your request to delete, with respect to data stored on the archived or backup system, until the archived or backup system relating to that data is restored to an active system or next accessed or used for a sale, disclosure, or commercial purpose.

We do not provide these deletion rights for B2B personal information.

Exercising Access and Deletion Rights

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

- Calling us at **(800) 537-8941, extension 3181**.
- Visiting our [Privacy Policy](https://ffcu.org/privacy) at ffcu.org/privacy

Only you, or someone legally authorized 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. To designate an authorized agent, a Power of Attorney or letters of conservatorship must be on file with the credit union.

You may only make a verifiable consumer request for access twice within a 12-month period.

The verifiable consumer request 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:

- Member Number; Full Name; email address; phone number; and home address.
- 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.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account via online banking, sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 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 through 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 our receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data access 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.

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.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request through our online banking page.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by submitting a request through our Online Banking page.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

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.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer

will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Changes to this Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated notice on our 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 the Credit Union collects and uses your information described here and in our general Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at:

By Phone:

(800) 537-8491, extension 3181

By Mail:

First Financial Credit Union
Attn: Risk Management Department
P.O. Box 5040
Pasadena, CA 91117