



## California Consumer Privacy Act Disclosure (CCPA Disclosure)

This California Consumer Privacy Act Disclosure is for California Residents only and supplements Vantage West Credit Union's Privacy Policy. This disclosure describes the Personal Information that Vantage West Credit Union ("we," "our," or "us") collects in the course of its business, explains how this information is collected, used, shared, and disclosed, describes rights provided by the California Consumer Privacy Act of 2018 ("CCPA") to California Residents ("consumers" or "you") regarding their Personal Information, and explains how consumers can exercise those rights.

Please note that, as a financial institution, most of the information we collect from you is exempt from disclosure because it is covered by or collected under the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, or other exemptions provided in the CCPA. The CCPA will not govern all of your interactions with us or the use of your personal information.

### What is Personal Information under CCPA

We may collect, use, share or disclose Personal Information. Personal Information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household ("Personal Information"). Personal Information does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information. Under the CCPA, Sensitive Personal Information includes a consumer's social security number, driver's license, financial account or card number, precise geolocation, racial and ethnic characteristics, religious and philosophical beliefs, union membership, contents of mail, email and text messages and genetic and biometric data ("Sensitive Personal Information").

### Sharing Personal Information

We disclose your personal information to third party service providers for our business and commercial purposes. When we disclose personal information to service providers, we enter a contract that describes the purpose and requires the recipient to keep that personal information confidential and not to use it for any purpose except performing the contract.

Vantage West Credit Union does not sell, rent, release, disclose, disseminate, make available, transfer, or otherwise communicate consumer's personal information to another business or third-party for monetary or other valuable consideration.

The criteria used to determine the period of time we will retain each category of Personal Information is driven by our records retention schedule in compliance with the numerous rules, laws and regulations governing financial institutions.

### Categories of Personal Information

Vantage West Credit Union may collect, or has collected, the following categories of Personal information from its Members in the preceding 12-months (please note that some categories overlap or may not apply to the financial services you obtained from us).

- **Identifiers** — A real name or alias; home or postal address; signature; home or mobile phone number; bank account number, credit card number, debit card number, employee ID number or other financial information; physical characteristics or description; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.
- **Characteristics of a Protected Class** — Age, race, color, citizenship, Military or Veteran status, sex/gender, or disability status.
- **Commercial Information** — Records of personal property, products or services purchased.

- **Biometric Information** — Identifying information, such as fingerprints or data collected for timekeeping or security purposes.
- **Internet or Other Similar Network Activity** — Browsing history, search history, information about a consumer's interaction with a website, application, or digital advertisement.
- **Geolocation Data** — Information used to identify your physical location in relation to a branch ATM, or the use of online/mobile banking services.
- **Sensory Data Audio** — Electronic, visual, thermal, olfactory, or similar information.
- **Employment and Professional Information** — Job title, job email address, business affiliation, work history, performance evaluations, education, skills, and other employment-related details.
- **Inferences Drawn From Other Personal Information** — Profile based on information, assumptions, and some of the data described above reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Sensitive Personal Information** — Information that reveals your Social Security and driver's license numbers, and other government identifications; account log-in information, account number in combination with required access code or password; credentials allowing access to an account; or a consumer's precise geolocation. We do not use or disclose your sensitive personal information for any purpose other than what is permitted by law.

### **Categories of Sources of Personal Information We Collect**

- **Direct From You or Your Authorized Agent** — We may collect information directly from you or your authorized agent (i.e., a person that has been legally granted the right to act on your behalf). For example, when you provide us with your name and Social Security number to open an account and become a Member.
- **Indirectly From You**— We may collect your IP address, device and advertising identifiers, browser type, operating system, Internet service provider ("ISP"), pages that you visit before and after visiting our website, the date and time of your visit, information about the links you click and pages you view on our website, and other standard server log information. We may also collect your mobile device's GPS signal, location, or other information about nearby Wi-Fi access points and cell towers. In addition, we may deploy and use cookies, web beacons, local shared objects, and other tracking technologies for various purposes, such as fraud. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.
- **From Our Service Providers** — We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.
- **From Our Website and Applications That You Access On Devices You Use** — We collect certain information from your activity on our website (vanagewest.org) and mobile application. When you visit our website or use our mobile application, your device and/or browser may automatically share certain information with us such as browser settings, IP addresses, connection dates and times, and similar technical information.

### **How We Use Your Personal Information**

- To provide you with information, products, or services that you request from us.
- Advertising our products and services to you.
- To provide you with email alerts, event registrations, or other notices concerning our products or services, events or news that may be of interest to you.
- To fulfil our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- For testing, research, and analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, Members, or others.

- To conduct employment-related activities, including payroll, benefits administration, and performance evaluations.
- To facilitate business-to-business transactions and communications.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- To conduct audit and risk management activities and manage internal controls.
- To respond to law enforcement requests and as required by applicable law, court order or comply with 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.
- As described to you, when collecting your personal information.

### **Categories of Third Parties to Whom We Disclose Information**

- Our third-party service providers;
- Our affiliates for their everyday business purposes — information about your transaction experiences;
- Other companies to bring you co-branded services, products, or programs; and
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise, to protect the rights, property or security of our customers or third parties.

### **Retention**

The amount of time that we may retain your personal information varies based on several factors including: how long we are required to maintain certain information to comply with applicable laws and regulatory requirements, the time required to accomplish business and commercial purposes outlined in this disclosure and for which information is collected, and the extent to which you exercise the rights described in this disclosure to request deletion of your personal information.

### **Rights and Choices for California Residents**

California residents have certain rights under the CCPA regarding their applicable personal information, including:

- The right to request the specific pieces of personal information we collected about you; the categories of personal information we collected; the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we share your personal information as they pertain to our activities.
- The right to request deletion of your personal information that we collected;
- The right to request correction of your personal information that we collected;
- The right to have someone you authorize make a request on your behalf; and
- The right not to be discriminated against for exercising any of these rights.

### **Submitting a Request to Know, Delete or Correct**

You have the right to request that we correct your inaccurate non-exempt Personal Information that we have collected and maintained. To submit a request to know, delete or correct your personal information we have collected about you, you or your authorized agent may submit a verifiable consumer request to us by either method below:

An online request — Click on the following link [CCPA Request](#) and follow the instructions or visit our Privacy Policy page at [VantageWest.org](#) to access the link.

A request by phone — Call us at (800) 888.7882. When calling us, inform the call center agent that you are calling to submit a California Consumer Privacy Act (CCPA) request and provide the information requested by the agent for identity verification purposes.

To process your request(s), we are required to verify your identity and, if applicable, the identity and authority of your authorized agent. We are also required to confirm your request and may do so by reaching out to you using the contact information you provided on your request.

If we receive a request through an authorized agent, we will require written proof or other legal documents with permission for the authorized agent to act on your behalf. Only you (or an authorized agent) may make a verifiable consumer request to know about your Personal Information and you (or an authorized agent) may make a verifiable consumer request to know on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

### **Response Timing and Format**

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days to process your request, we will provide you with an explanation for the delay. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. We will notify you of the results of your request. If applicable, our response will also explain why we cannot comply with a request.

Submitting a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity and authority to make the request. We may refuse to act on your CCPA request if, for example, it is unfounded or excessive, if we cannot verify your identity or the authority of your agent, or because of a conflict with federal or state law, and if so, we will let you know.

We do not charge a fee to process or respond to your verifiable consumer request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. For example, unless otherwise 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 with a different level or quality of goods or services.
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Changes to this Disclosure**

This CCPA Policy Disclosure is subject to change at any time. We will notify you of any material changes to our Policy as required by law. Any changes will become effective when posted unless indicated otherwise.

### **Contact Us**

If you have any questions regarding our privacy policies, our California Consumer Privacy Act Disclosure, the ways in which we collect, use, and disclose your Personal Information, or how to exercise your rights under the CCPA, please contact us at:

Website: [VantageWest.org](http://VantageWest.org)  
Email: [CCPARRequests@vantagewest.org](mailto:CCPARRequests@vantagewest.org)  
Phone: (800).888.7882