

## SECU California Notice at Collection and Privacy Disclosure

Last Updated: June 1, 2024

This California Notice at Collection and Privacy Disclosure (“Disclosure”) supplements our [Online Privacy Notice](#) and is provided by State Employees’ Credit Union and our subsidiaries and affiliates (“SECU,” “we,” “our,” or “us”) to California residents pursuant to the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”). This Disclosure constitutes our notice at collection and our privacy policy under the CCPA.

This Disclosure applies only to California residents, and only to “Personal Information” that is subject to the CCPA. Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly to a particular California resident.

The CCPA does not, however, apply to certain types of information, such as information about consumers that is subject to the Gramm-Leach-Bliley Act (“GLBA”). Thus, this Disclosure does not apply to information we collect about California residents who apply for and/or obtain our financial products and services that are to be used primarily for personal, family, or household purposes, which is subject to the GLBA. For more information about how we collect, disclose, and secure this type of information, please refer to our [Consumer Privacy Notice](#).

### 1. Collection of Personal Information

We collect, and in the preceding 12 months may have collected, information that falls within one or more of the below categories of Personal Information subject to the CCPA. Certain data elements appear in multiple categories in accordance with the CCPA’s descriptions of those categories and data elements.

- Identifiers, such as full name, home address, telephone numbers, email addresses.
- Unique online identifiers, such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular person or device.
- Internet or other electronic network activity information, such as search history, browsing history, login information, and IP addresses on our information systems and networks.
- Commercial information, such as transaction information and purchase history.
- Geolocation data, including the general location of a device used to access our Online Services, as derived from the associated IP address.
- Inferences and profiles based on other Personal Information, such as profiles derived from other Personal Information reflecting a person's preferences, including interests, hobbies, physical characteristics or descriptions, characteristic tendencies, behaviors, attitudes, or aptitudes.
- Audio, electronic, visual, and similar information, such as call, chat, and video recordings created in connection with our business activities.

- Professional and employment-related information, such as work history, resumes, cover letters, job application materials, academic and professional qualifications, educational records, references, and interview notes, job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.
- Education information, such as school records, school(s) attended, dates attended, degree(s) conferred, and academic achievements.
- Categories of Personal Information described in the California Civil Code § 1798.80, such as financial information including banking details, tax information, payroll information, and withholdings, health and safety information including health conditions, job restrictions, workplace illnesses and injury information, and health insurance policy information, and Social Security, passport and visa numbers and information.
- Sensitive Personal Information as defined by the CCPA, including:
  - Social Security, driver's license, state identification card, or passport number.
  - Precise geolocation, if you choose to enable location services through our mobile application, or to share your location with us when you use our websites.

## **2. Sources of Personal Information**

We may collect Personal Information subject to the CCPA from the following categories of sources:

- Directly from you when you provide it to us digitally or physically, for example, through forms you complete, or when you contact us by email, telephone, chat, or other means.
- Automatically and indirectly from you, such as through logging and analytics tools, cookies, pixel tags, and other automatic data collection on our websites and mobile applications.
- From third parties, such as our service providers, credit bureaus, consumer data resellers, services that make user-generated content available to others, communications services, social networks and social media online services, affiliates, and other business partners.

## **3. Use and Disclosure of Personal Information**

We may use, and in the preceding 12 months may have disclosed, each of the categories of Personal Information subject to CCPA that are listed in Section 1 above for the following business purposes:

- Providing our products and services and responding to inquiries you submit to us.
- Managing our business, including performing accounting, auditing, and other internal functions.
- Communicating with you and others, including about transaction, account-specific and/or general notification matters and alerts, special offers, ads, events, or new products or services that may be of interest to you.

- Personalizing and tailoring our services and otherwise enhancing your experience and interactions with us.
- Developing, operating, analyzing, improving, delivering, maintaining, and protecting our websites and mobile applications.
- Supporting our employment, human resource management, and employee benefits functions.
- Enhancing the safety and security of our products and services.
- Protecting the legal rights, property, safety, and security of records or information, our organization, our members and others, including detecting and preventing fraud, misuse of our websites and Online Services, and other unauthorized activity.
- Engaging in institutional risk control and resolving consumer and/or member disputes.
- Complying with industry standards, laws and regulations, court orders, legal investigations, contractual obligations, and our own internal policies.
- Enforcing our policies, practices, terms of use, or rights arising from contracts.
- For such other purposes as permitted by law or as you may authorize.

With respect to each of the categories of Personal Information that are subject to the CCPA listed in Section 1, the categories of persons or entities to whom we may disclose, and may in the preceding 12 months have disclosed, that information for the business purposes listed above include:

- Our service providers, including providers of analytics tools used on our websites and mobile applications.
- Our affiliates.
- Government agencies as required by laws and regulations.
- Third parties to whom you or your agents authorize or direct us to disclose your Personal Information.

We do not use or disclose Sensitive Personal Information, as that term is defined in the CCPA, for purposes other than those specified in the California Code of Regulations § 7027(m).

We do not “sell” or “share,” and have not “sold” or “shared” (as those terms are defined in the CCPA) in the preceding 12 months, Personal Information subject to the CCPA. Furthermore, we do not have actual knowledge that we sell or share the Personal Information of children under 16 years of age.

#### **4. Retention of Personal Information**

We will retain the Personal Information subject to the CCPA that we collect for as long as reasonably necessary to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to provide our products and services, provide you with customer service, answer your queries, or

resolve technical problems) unless a longer period is required or permitted by law, such as to fulfill our legal obligations or to establish, protect, or defend against legal claims.

## 5. Personal Information Rights and Choices

The CCPA provides California residents with specific rights regarding their Personal Information. This section describes those rights and explains how to exercise them.

- Right to Know. You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your Personal Information over the past 12 months. If we receive and confirm a verifiable consumer request from you pursuant to the “Exercising Rights” section below, we will, depending on the scope of the request, 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 Personal Information about you.
  - The categories of third parties to whom we disclose your Personal Information.
  - The specific pieces of Personal Information we collected about you.
- Right to Data Portability. You may request and obtain a copy of your Personal Information in a portable and, if technically feasible, readily-usable format that allows you to transmit the Personal Information to another person or entity without hindrance.
- Right to Deletion. You may request that we delete your Personal Information, subject to certain exceptions.
- Right to Correction. You may request that we correct Personal Information we have collected about you that is inaccurate. We will take into account the nature of the Personal Information and the purposes of our processing when we address your request.
- Non-Discrimination. You have a right not to receive discriminatory treatment for exercising your rights under the CCPA, including, if you are an employee, applicant, or independent contractor, a right not to be retaliated against for the exercise of your CCPA rights.

To exercise the rights described above, please submit a verifiable consumer request by either:

- Filling out and submitting our [Privacy Rights Request Form](#); or
- Calling SECU Member Services by phone at (888) 732-8562.

Only you, or an agent that you authorize 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.

You may only make a verifiable consumer request for access or data portability twice within a rolling 12-month period. Your request must provide information sufficient to verify you are the person about whom we collected Personal Information. To verify your request, we may ask you to provide information such as your first and last name, address, email address, phone number, and any other

information necessary to verify your identity. Your request must also include sufficient detail for us to properly understand, evaluate, and respond to it.

You may, in certain circumstances, designate an authorized agent to submit requests on your behalf through a valid power of attorney or through providing signed written permission that authorizes someone else as agent to act on your behalf. We may require additional information when requests are submitted through an authorized agent, such as requiring the submission of your signed written permission for the agent to act on your behalf, requiring you to verify your identity directly with us, and/or requiring you to confirm directly with us the authorized agent's permission to act on your behalf.

We cannot respond to a request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm that the Personal Information relates to you. If we cannot fulfill, or are permitted to decline, your request, we will alert you or your authorized agent.

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. We reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

## **6. Contact Information and Assistance**

If you have any questions or concerns about this Disclosure, please contact SECU Member Services by phone at (888) 732-8562, or by email at [info@ncsecu.org](mailto:info@ncsecu.org).

## **7. Changes to this Disclosure**

We may change or update this Disclosure from time to time. When we do so, we will post the revised Disclosure on this page with a new "Last Updated" date.