

## Santa Clara County Federal Credit Union Privacy Policy for California Residents

This **Privacy Notice for California Residents** supplements the information contained in Santa Clara County Federal Credit Union's ("we" or "our") General [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

### Information We Collect

Our Website collects 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:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - 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.
- Our Website has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.  Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	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).	YES

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES

Our Website obtains the categories of personal information listed above from the following categories of sources:

<b>Directly from you</b>	You enter or provide us with information, whether online or by email, phone or document upload. For example, your contact information that you provide, your application for a loan, or documents you provide to verify your identity.
<b>Directly and indirectly from you based on activity on our website</b>	For example, from submissions through our website or website usage details collected automatically.
<b>From vendors or third-parties that interact with us in connection with the services we perform</b>	For example, companies that work with us to market our products to you, credit reporting agencies from which we check your credit in connection with a submitted application, or other vendors that provide data we use in underwriting or in protecting you and our products from fraud and identity theft.

#### Use of Personal Information

We may use or disclose the personal information we collect 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 to request a loan or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- 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 help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- 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.

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 to a third party for a business purpose as required by law and as required to operate. 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.

We share your personal information with the following categories of third parties:

- Third party service providers.
- Affiliated websites to provide improved services when applicable by law.
- Lending partners and other companies to bring you co-branded services, products and programs.
- Third parties to assist with advertising our products, services and membership with you.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- Other third parties as required by law and to comply with subpoenas, court orders and search warrants; to verify or enforce our terms and conditions or other rights; to identify and fraud, security issues, technical issues, emergency situations or to otherwise protect the rights, property or security of our members or third parties.

### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, we have disclosed the following personal information for a business purpose:

**Category A: Identifiers**

**Category B: California Customer Records personal information categories**

**Category C: Protected classification characteristics under California or federal law**

**Category D: Commercial information**

**Category F: Internet or other similar network activity**

**Category G: Geolocation data**

**Category H: Professional or employment-related information**

### ***No Sales of Personal Information***

We do not sell personal information.

### **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 and Data Portability Rights***

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, 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 (also called a data portability request).

### ***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, 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.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by visiting [https://www.sccfcu.org/wp-content/uploads/CCPA\\_Policy.pdf](https://www.sccfcu.org/wp-content/uploads/CCPA_Policy.pdf) and completing the online request form or by :

**Phone:** 1-408-282-0700 or **Toll Free** at 1-800-282-6212

**Email:** [privacy@sccfcu.org](mailto:privacy@sccfcu.org)

**Postal Address:** *Santa Clara County FCU*

**Attn: Compliance**

P.O. Box 11024

San Jose, CA 95103

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.

If you use an authorized agent to exercise your rights, we will require you to provide your authorized agent with either (1) your power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your personal information on your behalf together with the identity verification information for you described above and confirmation that you have provided the authorized agent permission to submit the request.

You may only make a verifiable consumer request for access or data portability 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:
  - Asking security questions designed to identify you.
  - Requesting a copy of a valid photo ID and/or signature to accompany the request.
  - Requesting you visit a branch location in the event we are unable to identify you remotely.
- 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 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.

#### ***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.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability 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, specifically in paper format.

We do not charge a fee to process or respond to your verifiable consumer request unless the request would exceed an hour to complete and would therefore qualify as an Account Reconciliation/Research Fee under our [Fee Schedule](#). In the event the request will exceed an hour to complete, we will notify you before continuing with the request with the estimated time it will take to complete and the total estimated fee. The fees may be less than the estimated amount but may not exceed the estimated amount. No fees will be assessed without prior acknowledgment and consent. This acknowledgment or consent may include verbal or written authorization. The acknowledgment and consent will be documented on the summary of fees when the request has been completed.

### **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.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@sccfcu.org](mailto:privacy@sccfcu.org) or write us at:

*Santa Clara County FCU*  
**Attn: Compliance**  
P.O. Box 11024  
San Jose, CA 95103

### **Changes to Our 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 the 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.** This privacy notice was last updated on 06/25/2020.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Santa Clara County Federal Credit Union collects and uses your information described here and in the [Privacy Policy](#), your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-408-282-0700 or **Toll Free** at 1-800-282-6212

**Website:** [www.sccfcu.org](http://www.sccfcu.org)

**Email:** [privacy@sccfcu.org](mailto:privacy@sccfcu.org)

**Postal Address:** *Santa Clara County FCU*

**Attn: Compliance**

P.O. Box 11024

San Jose, CA 95103

# Santa Clara County Federal Credit Union

## California Consumer Privacy Act Request Form



As a California resident, you have the right under the California Consumer Privacy Act to receive or delete certain personal data that we collect about you. To exercise your rights, please complete, sign and submit the following form. We will contact you within 45 days upon receiving your request.

**All fields below are required:**

Name (First/Middle/Last):	
Date of birth (MM/DD/YY):	Phone #:
Email address:	Drivers License #:
Address:	
Unit/Apt #:	City:
State:	Zip:

**Check all that are applicable:**

- I have or had an account with the Credit Union.
- I am listed as a designated parent/guardian/Power of Attorney of an account holder (account number required in section below).

Account number(s): \_\_\_\_\_

**Check the action you want us to take with regards to the CCPA Law:**

- I want to know what personal information has been collected or shared about me\*\*
- I want to delete personal information you have about me (exceptions may apply)\*\*

\*\*If you want us to disclose specific pieces of personal information that we collected about you or delete personal information that we collected about you, **you also must include the following:**

- A copy of the front and back of your driver's license or other government-issued identification card

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Send Completed, Signed Forms To:**

**Via US Mail:**  
Santa Clara County Federal Credit Union  
Attn: Privacy  
P.O. Box 11024 San Jose, CA 95103

**Or Via email:**  
email us at [privacy@sccfcu.org](mailto:privacy@sccfcu.org)

**OR** Contact us at: 408-282-0700 or 1-800-282-6212 to submit a request