

CALIFORNIA CONSUMER PRIVACY POLICY

Effective Date: January 1, 2020

Last updated: March 27, 2020

Your privacy is important to us. This Consumer Privacy Policy ("Policy") explains how Nuvision Federal Credit Union ("Nuvision" or "our" or "we" or "us") collect, share, use, and protect your personal information through your online and offline interactions with us.

For California residents, this Privacy Policy is adopted in accordance with the California Consumer Privacy Act of 2018 ("CCPA") and the California Online Privacy Protect Act ("CalOPPA"), and any terms defined in the CCPA and CalOPPA have the same meaning when used in this Policy.

This Policy includes references and links to Nuvision's Privacy Notices which serve different purposes under various laws and regulations that apply to us.

I. CATEGORIES OF INFORMATION WE COLLECT

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

Categories	Examples
A. Identifiers and consumer records information	A real name or alias; postal address; signature; home phone number or mobile phone number; bank account number, credit card number, debit card 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.
B. Protected classification characteristics under state 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).
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
D. Biometric information	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.
E. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

F. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
G. Sensory data	Audio, electronic, visual, thermal or similar information.
H. Professional or employment-related information	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records
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))	Educational 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

II. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT

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

a. From You or Your Authorized Agent

We may collect information directly from you or your authorized agent. For example, when you provide us your name and Social Security number to open an account and become a member.

b. From Our Website and Applications That You Access on Your Mobile Device

We collect certain information from your activity on our website activity on our website (<u>www.nuvisionfederal.com</u>) and your use of applications on your mobile device. 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, or other information about nearby Wi-Fi access points and cell towers.

c. The Role of Cookies and Other Online Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies for various purposes such as fraud prevention. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

"Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.

d. Online Advertising

You will see advertisements on our website for our own products or services (including pre-screened offers of credit) or for products and services offered by our affiliates.

e. Third-party service providers in connection with our services or our business purposes

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.

III. HOW WE USE YOUR PERSONAL INFORMATION

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

- To fulfill or meet the reason for which the information is provided. For example, you apply for a loan, and we use the information in your loan application to give you the loan.
- To provide you with information, products or services that you request from us.
- To evaluate your candidacy for employment or for an independent contractor engagement, and to administer employment-related benefits for you, your spouse or domestic partner, and your dependents.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- 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, our members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- 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.
- 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.

IV. SHARING PERSONAL INFORMATION

We may share your personal information for a business purpose. The general categories of third-parties that we share with are as follows:

- 1. Our third-party service providers;
- 2. Our affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations;
- 3. Other companies to bring you co-branded services, products or programs;
- 4. Third parties that help us advertise products, services or membership with us to you;

- 5. 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;
- 6. Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our financial institution or affiliated business; and
- 7. 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.

In the preceding 12-months, we may have disclosed the following categories of personal information for a business purpose and, for each category, the following categories of third-parties with whom such personal information was shared:

Category of Personal Information (Represented in alphabetical form from the categories listed in Section I)	Category of Third-Parties (Represented in numerical form from the categories of third-parties identified in this Section)
 A. Identifiers and consumer records information 	1, 2, 5, 6, 7
 B. Protected classification characteristics under state or federal law 	1, 2, 5, 6, 7
C. Commercial information	1, 2, 5, 6, 7
D. Biometric information	1, 5, 7
 E. Internet or other similar network activity 	2
F. Geolocation data	5, 7
G. Sensory data	5, 7
 H. Professional or employment related information 	5, 7
I. Non-public education	5, 7

V. SELLING PERSONAL INFORMATION

In the past 12-months, we have not "sold" Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For the purposes of this Privacy Policy, "sold" means the disclosure of Personal Information subject to the CCPA to a third-party for monetary or other consideration.

VI. RIGHTS FOR CALIFORNIA RESIDENTS

If you are a California resident, this section describes your rights regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices under the CCPA.

- a. Request to Know about Personal Information being collected, disclosed or sold we do not charge a fee for this information. You may request we disclose the following information covering 12-months preceding your request.
 - i. the categories of Personal Information collected about you;
 - ii. the categories of sources from which Personal Information was collected;

- iii. our business purpose for collecting Personal Information about you;
- iv. the categories of third-parties that was disclosed your Personal Information (if applicable); and
- v. the specific pieces of Personal Information we collected about you.
- b. Request that we Delete Personal Information collected about you; unless the CCPA recognizes an exception;
- c. Be free from unlawful discrimination for exercising your rights under the CCPA; and
- d. Request that we correct your Personal Information collected from you through our website and online services.

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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

An authorized agent is any person or legal entity registered with the California Secretary of State that you have authorized to act on your behalf. If we receive a request through your authorized agent, we may require:

- a. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
- b. You to directly verify with us that you have provided the authorized agent to submit the request.
- c. We will not require either of the above if your authorized agent provides a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and we are able to verify authorized agent's identity.
- d. We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

We endeavor to respond to all verified requests within 45 days of its receipt. If we require more time to process your request (up to an additional 45 days), we will provide you with an explanation for the delay and send the information via mail.

Any disclosures we provide will only cover the 12-month period preceding your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the revised Policy on our website with a new "Last Updated" date.

VII. How to Exercise Your Rights:

- a. Visit <u>www.nuvisionfederal.com</u> and complete a Submission Form for Request to Know and/or Delete Personal and/or Household Information
- b. Call us at 800-444-6327
- c. Visit one of our branch locations

VIII. Questions or Concerns:

If you have any questions or concerns about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

Email:	Web form is available at: <u>https://nuvisionfederal.com/contact-us</u> .
Mail:	Nuvision Credit Union
	7812 Edinger Avenue
	Huntington Beach, CA 92647