



## **INTRODUCTION**

This California Consumer Privacy Act Disclosure (see California Civil Code Section 1798.100 et seq. explains how San Francisco Federal Credit Union (the “Credit Union” or “we” and “our”) collects, uses, and discloses personal information relating to California residents covered by the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA only applies to information about residents of California. Under the CCPA, covered businesses that collect the personal information of California residents must provide notice regarding their data collection and sharing practices. Under the CCPA, “personal information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. This information is referred to in this Notice as “Personal Information.”

## **APPLICABILITY**

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (“GLBA”). For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [Credit Union’s Consumer Privacy Policy](#).

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

## **SALE OF 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 purposes of this Disclosure, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

## **CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT AND DISCLOSE**

We collect and disclose Personal Information in a variety of contexts. For example, we collect and disclose Personal Information to provide individual and commercial financial products and services, and for our employment and human resource purposes.

The Personal Information that we collect, use, or disclose about a specific California resident will depend on, for example, our relationship or interaction with that individual.

During the past 12 months, we have collected the following categories of Personal Information:

- (1) Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver’s license number, and passport number



- (2) Personal information, including contact details such as telephone number and address, financial information such as account number and balance, payment card details including credit and debit card numbers.
- (3) Characteristics of protected classes or groups under state or federal law, such as sex or marital status
- (4) Purchase information, such as products and services obtained and transaction histories
- (5) Internet or online information such as browsing history, and information regarding interaction with our websites, applications, or advertisements
- (6) Geolocation data
- (7) Audio, electronic, visual, thermal, olfactory, or similar information
- (8) Professional or employment-related information
- (9) Education information; and
- (10) Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics

**WHY WE COLLECT PERSONAL INFORMATION AND HOW WE USE IT**

The purposes for which we collect and use Personal Information depend on, among other things, our relationship or interaction with a specific California resident. The table below lists the purposes for which we collect and use Personal Information in different contexts.

Purposes for Collection and Use	Examples
Provide and manage products and services	Establish and process transactions for our products and services including checking accounts, credit cards, loans, investment accounts, as well as additional products for businesses such as commercial financing and payment services  Support the ongoing management and maintenance of our products and services including to provide account statements, online banking access, customer service, payments and collections, and account notifications
Support our everyday operations, including to meet risk, legal, and compliance requirements	Perform accounting, monitoring, and reporting Enable information security and anti-fraud operations, as well as credit, underwriting, and due diligence Support audit and investigations, legal requests and demands, as well as exercise and defend legal claims Enable the use of service providers for business purposes



	Comply with policies, procedures, and contractual obligations
Manage, improve, and develop our business	Market, personalize, develop, as well as improve our products and services Conduct research and analysis, including to drive product and services innovation
Support employment, infrastructure, and human resource management	Provide benefits to employees and dependents, including healthcare and retirement plans Manage pay and compensation activities Manage and operate our facilities and infrastructure Process employment applications

### **SOURCES OF PERSONAL INFORMATION**

The sources from which we collect Personal Information depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Information in different contexts.

- (1) From California residents directly, or other individuals acting on their behalf, through physical (e.g., paper application), audible (e.g., phone), or electronic (e.g., website, social media) sources.
- (2) Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, or local government entities.
- (3) Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing.
- (4) Outside companies or organizations from whom we collect Personal Information to support human resource and workforce management activities.
- (5) Outside companies or organizations from whom we collect personal data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

### **CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL DATA**

The categories of third parties with whom we share Personal Information depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of third parties with whom we share Personal Information in different contexts.

- (1) Outside companies or organizations with whom we share Personal Information as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.



- (2) Companies or individuals that represent California residents such as an accountant, financial advisor, or holding power of attorney.
- (3) Government agencies including to support regulatory and legal requirements.
- (4) Outside companies or organizations, including service providers, to whom we provide Personal Information to support human resource activities and workforce management.
- (5) Outside companies or organizations, in connection with routine or required reporting, including consumer reporting agencies and other parties.
- (6) Additionally, a consumer's contact information, but not the consumer's financial or other information, may be shared with a partner organization such as MyPath, upon the explicit request of the consumer.

### **RIGHTS UNDER THE CCPA**

If you are a California resident, you have the right to:

- (1) Request we disclose to you free of charge the following information covering the 12 months preceding your request:
  - (a) the categories of Personal Information about you that we collected;
  - (b) the categories of sources from which the Personal Information was collected;
  - (c) the purpose for collecting Personal Information about you;
  - (d) the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
  - (e) the specific pieces of Personal Information we collected about you (subject to applicable exceptions, including information covered by the GLBA) ;
- (2) Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
- (3) Be free from unlawful discrimination for exercising your rights under the CCPA

You also have the right to designate an authorized agent to make a request under the CCPA on your behalf. If you wish to designate an authorized agent, the Credit Union requires a valid power of attorney with express powers under the CCPA.

Requests for specific pieces of Personal Information will require additional information to verify your identity.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on



behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

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 in order to process your request, we will provide you with an explanation for the delay.

### **HOW TO EXERCISE YOUR RIGHTS**

If you are a California resident, you may submit a request by:

1. Completing an online [Personal Request Information Form](#)
2. Calling 1-800-852-7598

### **CHANGES TO THIS CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE**

Disclosure on this page with a new "Last Updated" date.

We may change or update this Disclosure from time to time. When we do, we will post the revised