CCPA Privacy Notice For California Residents



Last Updated: January 1, 2022

7 17 Credit Union ("7 17" or "Credit Union"), a member-owned financial institution, is committed to providing you with competitive products and services to meet your financial needs and help you reach your goals. We are equally committed to protecting the privacy of our members.

This notice explains how we collect, use, and disclose personal information about California residents. It supplements 7 17 Credit Union's Privacy Notice and Online Privacy Notice by providing you with information about your rights under the California Consumer Privacy Act (CCPA). Please refer to our general <u>Privacy Notice (www.717cu.com/privacypolicy</u>) for additional information regarding other general privacy practices, your privacy rights and the types of personal information we collect and share as we conduct business of the Credit Union.

Details about Personal Information Collected

We may have collected the following **Categories** of personal information within the last twelve (12) months:

Categories of Personal Information	Examples
Identifiers	Name, alternate names, address, phone number, email address, unique personal identifier, online identifier, Internet Protocol (IP) address, account name, social security number, driver's license number, passport number, or other similar identifiers
Consumer Records Information	Signature, physical characteristics or description, government issued identification card number, insurance policy number, education, financial institution account number, credit and debit card number, income and other financial information
Protected Classification Characteristics Under State or Federal Law	Race, color, national origin, citizenship, age, sex, gender, marital status, disability, and military and veteran status
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
Internet or Network Activity	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement
Geolocation Data	Device physical location, Internet Protocol (IP) location
Sensory Information	Audio, electronic, visual or similar information such as call and video recordings
Professional or Employment information	Work history and prior employer
Education Information when applying for Employment	School name and type, date of graduation, degree, major, and GPA

Inferences	Inferences drawn from any of the information identified
	herein to create a profile, for example, reflecting an
	individual's preferences and characteristics

We may collect personal information from the following **Sources**:

- Directly from you
- From your devices, such as when you visit our websites, online and mobile applications
- Other individuals, such as your authorized agent, guardian or attorney-in-fact
- Service Providers or vendors who provide services on behalf of 7 17 Credit Union
- Affiliates
- Joint marketing partners
- Government entities and public record sources
- Other third parties you may consent to during an application such as employers and financial institutions
- Credit reporting agencies
- Consumer data resellers
- Social networks

We may collect or disclose personal information for one or more of the following **Business** or **Commercial Purposes**:

- To create, maintain, customize, and secure your relationship with us.
- To verify the identity of the person conducting the account transaction or inquiry with us or our service providers.
- To process your requests, inquiries, applications, transactions, and payments.
- To fulfill a request for which the information was provided. For example, if you share your name and contact information to request a payment quote, apply for membership or a product, or ask a question about our products or services, we will use that personal information to respond to the inquiry.
- To provide, develop, support, evaluate, improve and personalize your experience on our website, mobile applications, products, and services.
- To personalize your online experience and to deliver content, product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and by email or text message.
- To prevent fraud and help maintain the safety, security, and integrity of our website, products and services, databases, other technology assets, and business.
- For testing, research, analysis, data analytics, and product development, including to develop and improve our website, products, and services.
- To perform accounting, auditing and other internal functions.
- To comply with and enforce legal and regulatory requirements, contractual obligations, and our policies.
- To respond to law enforcement requests as required by applicable law, court order, or governmental regulations or guidance.
- For any other purposes that we may specifically disclose at the time you provide or we collect your information.

Disclosure of Personal Information

In the preceding 12 months, we have disclosed consumer personal information to Service Providers and the following categories of third parties in order to carry out specific business or commercial purposes as described herein:

• Vendors who provide services on 7 17's behalf

- Professional services organizations, such as auditors and law firms
- Business partners
- Data analytics providers
- Government entities
- Credit and other consumer reporting agencies
- Other entities at your request

Sale of Personal Information

7 17 Credit Union has not sold any personal information to third parties in the preceding 12 months, including the personal information of minors under 16 years of age. In addition, we do not and will not sell personal information regardless of age, therefore we do not offer members the ability to opt-out of the sale of such information.

Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that 7 17 Credit Union disclose what personal information it collects, uses, discloses, and sells.

Right to Request the Deletion of Personal Information

You have the right to request the deletion of personal information unless it is necessary for the Credit Union or its service providers to:

- Complete the transaction for which the information was collected.
- Provide a product or service you have requested or reasonably anticipated within the context of 7 17's ongoing relationship with you.
- Fulfill a contract between 7 17 and you.
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug or identify and repair errors.
- Comply with a legal obligation.
- Otherwise use your information internally, in a lawful manner that is compatible with the context in which you provided the information.

Exercising Your Right to Know or Delete Personal Information

We require you to complete a "<u>Request to Know or Delete</u>" form that will provide us with the appropriate information to fulfill your request. We provide three options to obtain this form:

Option 1) Submit a request by sending an email to: Privacy@717cu.com. The form will be sent to you by email unless you provide a mailing address and instructions to send the form by mail.

Option 2) Call our Teleservices department at 800-775-7741 to request a paper form be mailed to you.

Option 3) Visit www.717cu.com, click on the privacy policy link and follow the instructions to complete and submit an online "<u>Request to Know or Delete</u>" form.

You will be asked to provide information which may include your name, account number, date of birth, address, phone number, the last 4 of your Social Security Number and/or a copy of an unexpired, government issued identification. We will use the identifying information you provide to attempt to verify your identity. At our discretion, we may require the form to be notarized, and we may use a third-party provider to assist in verification. If we are not able to verify the request is legitimate, or the requestors identity, we will not fulfill the request.

Authorized Agent

Only you, or an authorized agent, may make verifiable requests related to your personal information. You or your authorized agent are limited to two requests within a 12-month period.

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

- a. Submission of a written and notarized 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 the 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.

Right to Non-Discrimination for the Exercise of CCPA Rights

You have the right not to be discriminated against for exercising any of your rights under the CCPA.

Responding to Requests

7 17 will acknowledge receipt of the request within 10 business days of its receipt and respond to a verifiable consumer request within 45 calendar days of its receipt. If 7 17 requires more time, we will inform you or your authorized agent of the reason and extension period in writing. If you have an account with 7 17, the credit union will deliver a written response to the address on your account. If you do not have an account, the response will be delivered by mail or electronically, at your option. Any disclosure of information 7 17 provides will only cover the 12-month period preceding the verifiable consumer request's receipt. The response will also explain the reasons 7 17 cannot comply with a request, if applicable.

Contact for More Information

If you have any questions regarding our privacy policies, our CCPA Privacy Notice, 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:

- Email: Privacy@717cu.com
- <u>Phone</u>: 800-775-7741
- Mail: Attn: Compliance Dept. 7 17 Credit Union 3181 Larchmont Ave NE Warren, OH 44483