

## CCPA Privacy Policy

### Your Rights under the California Consumer Privacy Act

1. Right to know the information we collect about you
2. Right to know what information we share about you
3. Right to request:
  - a. The categories of personal information collected about you within the preceding 12 months
  - b. The categories of sources from which the personal information is collected
  - c. The business or commercial purpose for collecting personal information
  - d. The categories of third parties with whom information is shared
  - e. The specific pieces of personal information that we have collected about you
4. Right to request deleting of certain personal information
5. Right to non-discrimination in accessing products and services when exercising these rights

### Right to Know

Under the California Consumer Privacy Act, consumers have the right to request that the credit union disclose certain personal information that it collects, uses, discloses and sells that is not subject to the exemption of information covered under the federal Gramm-Leach-Bliley Act and implementing regulations and the California Financial Information Privacy Act or the Fair Credit Reporting Act.

To request this information please provide us with the following in your request:

- Your full name
- Any name you may have used with us within the last 12 months
- Your address within the last 12 months
- How you interacted with us within the last 12 months
- Any other information you feel will help us identify any records we have collected about you in the preceding 12 months.

By law and regulation we are required to positively verify your identity prior to responding to your request.

- You will need to provide a valid identification card including a state-issued driver's license, ID card or US or other government-issued passport; plus the address portion of a utility bill, bank, investment or credit card statement (number redacted) that contains the name and address that matches your ID and information request.
- If making a request by phone, we may require you to answer specific questions based on information we have or can obtain about you or have you otherwise verify your identity.
- If you are requesting to know *specific* pieces of information a higher degree of verification may be required. We will also require, pursuant to CCPA regulations, that you submit a signed declaration under penalty of perjury that you are the consumer to whom the information relates.
- If we are unable to positively identify the person making the request is the consumer to whom the information relates, we may ask for additional verification or may deny the request.

If you use an authorized agent to submit a request to know information under CCPA, you must verify your own identity with us; and provide the agent written permission to submit the request on your behalf unless the agent

holds a valid Power of Attorney of Conservatorship of the Estate for you. An agent's failure to provide proof of authorization will result in a denial of the request.

To submit a verifiable Right to Know request for information, click [here](#) or email [compliance@firstcitycu.org](mailto:compliance@firstcitycu.org) or call us at (800) 944-2200, or you may also write to us at: First City Credit Union - Attention Compliance - PO Box 93727 Pasadena, CA 91109-3727.

## **Collection and Disclosure of Personal Information**

As a financial institution, most of the information we collect falls under the federal Gramm-Leach-Bliley Act or California Information Privacy Act or Fair Credit Reporting Act and is collected used or shared in order to provide you with financial products or services. This information is exempt from the provisions of the California Consumer Privacy Act (CCPA).

### **Accountholders**

If you have an account with us, notification of our privacy practices was provided at account opening. If you would like an additional notice, it can be found at the bottom of our homepage, here: [www.firstcitycu.org](http://www.firstcitycu.org); or you may call us at (800) 944-2200 option 9, or send an e-mail to [compliance@firstcitycu.org](mailto:compliance@firstcitycu.org) (do **not** include your account number or sensitive information) and we will send one to you. You may also write to us at First City Credit Union - Attention Compliance - PO Box 93727 Pasadena, CA 91109-3727 to request a copy.

### **Non-Accountholders**

If you do not have a personal account with us, we may collect information about you and disclose the information as necessary for our business purposes to process a financial or other transaction initiated by you or by one of our accountholders. This information may be disclosed to third parties to process these transactions. The following are types of information that we may collect and disclose:

Name, address, e-mail address, social security number, driver's license, state ID or passport number or other similar identifier (used to identify you or as required by law); signature (on contracts, forms or deposits), telephone number, employment, sex, age (if needed to process a transaction or as required by law); financial institution name, account number, ATM, debit or credit card number (in conjunction with a transaction with us or our accountholder); visual information from ATM or security cameras (for security purposes); internet or other electronic network activity information (disclosed below).

If you are a party to a **business account**, this section applies to your personal information.

### **Website Users, Mobile Banking/Mobile App Users**

If you use our website, we may collect the following types of information from you that may be covered by the California Consumer Privacy Act:

IP address, browsing history, search history, products and services considered, products and services obtained geolocation data, and information about your interaction with our website, application or advertisement.

We collect this information for security purposes.

You can review our Online Privacy Policy [here](#).

If you complete an online form, we may also collect your name, e-mail address, physical address or phone number that you provide to us to be used as specified on or with the form.

If you use our mobile banking, we may collect the following types of information from you that may be covered by the California Consumer Privacy Act:

We may disclose this information to third parties to assist us with these purposes.

### **All Consumers**

In addition to the privacy practices listed above, the credit union may collect the following types of information from you that may be covered by the California Consumer Privacy Act:

Name, address, e-mail address, or phone number if you have entered any drawing or raffle or completed any information request form.

In addition to the privacy practices listed above, the credit union may collect the following types of information about you that may be covered by the California Consumer Privacy Act:

We collect information from third party providers such as consumer reporting agencies, marketing firms, social media, vendors and service providers, state and federal or local agencies, referrals from employees or others, and other financial institutions or transaction processors or parties. This information may be used for our business purposes to market our products and services to you, or for our own analytic use.

We may disclose this information to third parties to help us market our products and services to you, or assist us with our own analytic use.

### **Credit Union does not “sell” information as defined under CCPA**

The credit union does not sell, rent, release, disclose, disseminate, make available, transfer or otherwise communicate consumer’s personal information to another business or third party for monetary or other valuable consideration.

### **Right to Request Deletion of Personal Information**

Consumers have a right to request that certain information collected or maintained by the credit union be deleted after you have received our response to your Right to Know request. To submit a verifiable request to delete information, send an email to [compliance@firstcitycu.org](mailto:compliance@firstcitycu.org) or you may also write to us at First City Credit Union - Attention Compliance - PO Box 93727 Pasadena, CA 91109-3727.

*Please note that information necessary to comply with or be retained under a law, rule or regulation; information not subject to the CCPA; information necessary to process transactions or maintain accounts or as otherwise allowed by law is not subject to deletion.*

To request this information be deleted, please provide us with the following in your written request:

- Your full name
- The information you are requesting to be deleted

By law and regulation we are required to positively verify your identity prior to responding to your request.

- You will need to provide a valid identification card including a state-issued driver's license, ID card or US or other government-issued passport; plus the address portion of a utility bill, bank, investment or credit card statement (number redacted) that contains the name and address that matches your ID and information request.
- If we are unable to positively identify the person making the request to delete is the consumer to whom the information relates (or authority to make the request on the consumer's behalf), we may ask for additional verification or may deny the request.
- Prior to deleting information, we are required to re-verify your consent to delete.

### **Non Discrimination**

The credit union will not discriminate against a consumer who has exercised any of their rights under the CCPA.