

SF Fire Credit Union Privacy Policy for California Residents

This **Privacy Policy for California Residents** supplements the information contained in SF Fire Credit Union’s <https://sffirecu.org/policies/privacy-policy/> and applies solely to all visitors, users, and others, as well as owners, directors, officers and employees of companies that do business with the Credit Union, who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy rights Act of 2020 (CCPA), and its implementing regulations, and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy **does not apply** to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Also, this Policy **does not apply** to information collected from California residents who apply for or obtain our financial products and services for personal, family, or household purposes as this information is subject to the Gramm-Leach-Bliley Act (GLBA), Fair Credit Reporting Act (FCRA), or California Financial Information Privacy Act (FIPA) and is excluded from the CCPA’s scope. For more information on how we collect, disclose, and secure this information, please refer to our Privacy Policy (https://sffirecu.org/wp-content/uploads/Privacy_Notice.pdf).

Information We Collect

We collect 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, or deidentified or aggregated consumer information.

We retain this information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below describes the categories of personal information we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Category of Personal Information Collected	Business Purpose for Collection	Sold or Shared	Retention
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.)	Required for Account Services and Regulatory and Compliance Purposes	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.

California Customer Records personal information (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.)	Required for Account Services and Compliance Purposes	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
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).)	Only as required by State or Federal Law.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Commercial information (Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.)	Only collected if required for Products and Account Services.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
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.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Internet or other similar network activity (Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Geolocation data (Physical location or movements.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Sensory data (Audio, electronic, visual, thermal, olfactory, or similar information.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Professional or employment-related information (Current or past job history or performance evaluations.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.

Non-public education information (Education 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.)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Inferences drawn from other personal information (Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.)	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.

The table below describes the categories of **sensitive personal information** we have collected from consumers within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Category of Sensitive Personal Information	Business Purpose for Collection	Sold or Shared	Retention
Government identifiers (social security, driver's license, state identification card, or passport number)	Required for Account Services and Regulatory and Compliance Purposes	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Complete account access credentials (usernames, account numbers, or card numbers combined with required access/security code or password)	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Precise Geolocation	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Racial or Ethnic Origin	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Religious or Philosophical Beliefs	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Union Membership	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Genetic Data	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Mail, email, or text messages contents not directed to us	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.

Unique identifying biometric information	Only collected if required for Account Services or for Regulatory and/or Compliance Purposes.	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Health information	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.
Sex life, or sexual orientation information	Not collected	No	Until deletion of the account, or until no longer needed to comply with our legal obligations.

Sources of Personal Information

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

- Directly from you or your representatives;
- Service Providers, Consumer Data Resellers, Credit Reporting Agencies and other similar persons or entities;
- Public Record Sources (Federal, State or Local Government Sources);
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media;
- Information from member directed persons or entities or institutions representing a member/prospect; and
- Information from business members about individuals associated with the business member (e.g., an employee or board member).

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 or ask a question about our financial products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to apply for a financial product or enroll in a service, we will use that information to complete your request.
- To provide, support, personalize, and develop our Website, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, 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 personalize your Website experience and to deliver content and financial product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, financial 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.
- As otherwise required by applicable law.

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 or Selling Personal Information

As used in this policy, and as defined in the CCPA, “share” means communicating a consumer’s personal information to a third party for cross-context behavioral advertising. We do not share your personal information.

We do not sell personal information, including that of consumers we actually know are less than 16 years old.

Disclosing Personal Information to Service Providers or Contractors for Business Purposes

We may disclose your personal information to a Service Providers or Contractors for a business purpose. In the preceding twelve (12) months, Credit Union has disclosed following categories of personal information for a business purpose to Service Providers or Contractors:

- Identifiers.
- California Customer Records personal information categories.
- Protected Classification characteristics under California or federal law.
- Commercial Information.
- Biometric information.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.
- Non-public education information.
- Inferences drawn from other personal information.
- Government identifiers.
- Complete account access credentials.
- Precise geolocation.
- Racial or ethnic origin.
- Religious or philosophical beliefs.
- Union membership.
- Genetic data.
- Mail, email, or text messages contents not directed to us.

- Unique identifying biometric information.
- Health information.
- Sex life, or sexual orientation information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information (the “right to know”). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), depending on the information you 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, selling or sharing that personal information.
- The categories of third parties, if any, to whom we make available that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

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 (the “right to delete”). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractor(s) to:

1. Complete the transaction for which we collected the personal information, provide a financial product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you 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.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors and other third parties, if any, to take similar action.

Right to Correct

You have the right to request that we correct any inaccurate personal information that we maintain about you (the "right to correct"). Once we receive your request and confirm your identity (see Exercising Your CCPA Rights), we will review your request correct the inaccurate information.

Right to Opt-out of Sale or Sharing

We do not sell or share your personal information. Therefore, we are not required to provide you with the right to opt-out of sale or sharing.

Right to Limit

We only use a consumer's sensitive personal information for the purposes identified in Section 7027(m) of the California Code of Regulations. Therefore, we are not required to give you notice of the right to limit the use of sensitive personal information or give you the opportunity to request that such information be limited.

Right to be Free from 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 financial products or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of financial products or services.
- Suggest that you may receive a different price or rate for financial products or services or a different level or quality of financial products or services.

Exercising Your CCPA Rights

To exercise your rights to know, delete or correct described above, please submit a request by either:

- Calling us at (888) 499-FIRE (3473)
- Visiting <https://sffirecu.org/ccpa-request/>
- By Mail:
SF Fire Credit Union
Attn: Member Services – CCPA Request
3201 California St.
San Francisco, CA 94118

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information. To designate an authorized agent, provide a written request including your government issued photo ID, and contact information.

By Mail:
SF Fire Credit Union
Attn: Member Services – CCPA Request
3201 California St.
San Francisco, CA 94118

You may also make a request to know, delete, or correct on behalf of your child by

- Calling us at (888) 499-FIRE (3473)
- Visiting <https://sffirecu.org/ccpa-request/>
- By Mail:
SF Fire Credit Union
Attn: Member Services – CCPA Request
3201 California St.
San Francisco, CA 94118

You may only submit a request to know twice within a 12-month period. Your request to know, delete, or correct 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:
 - Verification Requirements - Identity verification requirements may include but are not limited to government issued photo ID and verification of other identifying personal information.
 - Parent or Guardian Verification Requirements - Identity verification requirements may include but are not limited to government issued photo ID and verification of other identifying personal information.
- 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.

You do not need to create an account with us to submit a request to know or delete. [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 the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact (888) 499-FIRE (3473). (888) 499-FIRE (3473).

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. For a request to know, you may request information collected beyond the 12-month period provided the information was collected on or after January 1, 2022, and providing the information would not be impossible or involve disproportionate effort. 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 .PDF or .CSV.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Changes to Our Privacy Policy

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 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.**

Contact Information

If you have any questions or comments about this notice, the ways in which SF Fire 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: (888) 499-FIRE (3473)

Website: <https://sffirecu.org/support/contact-us/>

Postal Address:

SF Fire Credit Union

Attn: Member Services – CCPA Request

3201 California St.

San Francisco, CA 94118

If you need to access this Policy in an alternative format due to having a disability, please contact (888) 499-FIRE (3473).

Date Last Updated: 04/29/2024