

This policy describes how San Diego County Credit Union collects, uses, protects and discloses information. It applies to uses of our site and apps, and other times when it is provided to you. This policy does not apply to our collection and use of information when providing you with financial services. Instead, please read our <u>Annual Privacy Notice</u>. This policy also does not apply to employees.

### **NOTICE AT COLLECTION**

#### Information We Collect

We collect different categories of information from or about you as listed below when you are a job applicant, customer or website visitor. To learn about information we collect when you are a customer of our financial services, please read our Annual Privacy Notice.

- Contact information. We collect your name and email address. We may also collect your phone numbers or address. We may also collect your company name.
- Demographic information. We may collect your sex and marital status.
- Audio or visual information. We collect images or audio from CCTV in our locations. We may also collect phone call information.
- Submitted information. We collect any other information you voluntarily provide to us. This might include reviews or feedback.
- **Device and Site Usage.** We collect log and session data when you visit our website or use our applications. We collect browser and operating system information. We collect what site you came from or what site you visit when you leave us. We collect your IP address. We also collect device identifiers.
- Location Information. We collect your location information using your GPS coordinates and other location information from your device.
- Recruitment information. If you apply for a job, we collect information about your education and work history. We will also ask about your skills and qualifications for the position. We may ask about your salary expectations and how you learned of the position. We may also collect references and screening test reports. We may ask about your driving record or other information about your ability to perform the position.

California law requires us to tell you if we share any categories of information for cross-contextual behavioral advertising. We do not engage in this practice, and thus, do not share any of these categories of information for cross-contextual advertising.

### **How We Use Information**

We use your information for the business reasons outlined here:

- We use your information to communicate with you: We use information to respond to requests and to communicate with you. This
  includes providing you with information about our policies and terms. For questions about how we communicate with you about your
  account, please read our <a href="Annual Privacy Notice">Annual Privacy Notice</a>.
- We use your information for recruitment purposes: We use your information to process job applications. We use your information
  to update you about your application with us. We use your information to conduct background checks or verify prior employment.
- We use your information to improve: We use your information to improve our platforms and products. This may include customizing your experience with us improving our platforms and services. It also includes troubleshooting. This includes learning how to best tailor our website for our current and future visitors. We use your information to provide more relevant search results on our websites and apps.
- We use your information to comply with legal or regulatory obligations imposed on us: this includes for security purposes and to help avoid fraud or to protect the company or its constituents.
- We use information for marketing purposes. As permitted by law, we may use information to let you know about our products or services. We use your information to conduct research and data analysis. We also use information to provide you with newsletters or other content we think you may find interesting. We may send you surveys. We may do this by phone or email. We may also use your information to engage in interest-based advertising. We may also serve ads that we think are relevant to you based on your browsing habits or online activities.
- We use information as otherwise permitted by law or as we may notify you.
- Our use of sensitive information: We do not use or disclose sensitive information, as that term is defined in California, for inferring characteristics or for purposes other than those permitted by law.

#### **How Long We Keep Information**

We keep personal information as long as it is necessary or relevant for the practices described in this Policy. We also keep information as otherwise required by law.

### **More Information About Our Privacy Practices**

For more information about our privacy practice, please read the rest of our Privacy Policy, below.

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### **HOW WE COLLECT INFORMATION**

We collect information directly from you. For example, we collect information if you contact us. We also collect information if you sign up for email communications or submit information to us. This includes when you call us at attend an event. We also collect your information when you apply for a job with us.

We collect information passively. We collect information about users over time and across different websites and apps. We also work with third parties that collect personal information this way. We may use several common tracking tools to collect information. Tracking tools include browser cookies and web beacons. To learn more about cookies visit the FTC's Online Tracking page. We may work with others to gather information on our platforms and elsewhere. We may do this on our websites and in emails that we send to you.

We collect information about you from others. Business partners or third parties may provide information about you to us. Entities that perform background checks may provide us with information.

### WE COMBINE INFORMATION

We may combine information that we have collected offline with information that we collect online as permitted by law. We combine information collected across devices, such as computers and mobile devices. We also combine information that we get from a third-party with information we already have.

### **HOW WE DISCLOSE INFORMATION**

Below are times when we may disclose your personal information. We have also indicated the categories of entities to whom we may disclose your personal information:

- We disclose your information with vendors and others who perform services on our behalf. We may disclose all categories
  of information with trusted service providers. These include companies who help us operate and host our website. It also includes
  third party marketing vendors and companies who help us evaluate your job application.
- We may share information for cross-contextual behavioral advertising. We may share information with third parties in order to
  provide cross-contextual behavioral advertising. In the Notice at Collection (above) we outlined which categories of information are
  shared for cross-contextual behavioral advertising.
- We may disclose information if we think we have to in order to comply with the law. We will transfer all categories of information to respond to a court order or subpoena. We will also disclose it if a government agency or investigatory body requests. This includes US and non-US law enforcement or regulatory authorities.
- We disclose information for security purposes. This includes disclosing to protect ourselves or to protect you. This includes
  disclosing information to law enforcement to assist in criminal investigations. It may also include to protect other consumers or platform
  users.
- We may transfer information with any successor to all or part of our business. If all or part of our business was sold, we may transfer all categories of information as part of that transaction. If there is a merger or acquisition, we may disclose your information.
- We may disclose information for other reasons we may describe to you or as permitted by law.

Additional information for California residents. California law requires that we tell you if we sell personal information with a third party for monetary or (in California) other valuable consideration. We do not do this. We also do not sell personal information of minors under the age of 16 for monetary or other valuable consideration.

#### YOUR RIGHTS AND CHOICES

### You Can Opt-Out of Certain Marketing

You can review, correct, update, or change your information or opt out of receiving certain emails by changing the relevant settings in your account or by contacting us through sdccu.com/contact. You can also stop receiving our marketing emails by emailing us at the address noted at the end or follow the instructions in any marketing email message you get from us. If you opt out of marketing emails you will continue to receive emails from us about your relationship with us where permitted by law.

### **Cookies and Targeting Tools**

We collect personal information about users over time and across different websites when you use our platforms. We also have third parties that collect personal information this way. To do this, we use several common tracking tools. These may include browser cookies. We may also use web beacons, flash, cookies, and similar technologies. We may have third parties collect personal information this way. We use cookies to authenticate online banking users. We use analytics providers to analyze site use and provide advertisements to you on other websites. To learn more about cookies visit here.

- How we use tracking tools. We use tracking tools to recognize new or past site visitors or to understand where they have come from or where they go after they leave our site. We also use these tools to improve our sites and better understand how you use our platforms. We may also use them to serve content in which we think you may be interested.
- Our Do Not Track Policy: Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.

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You can control cookies and tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop. To control flash cookies, which we may use, go <a href="here">here</a>, because flash cookies cannot be controlled through your browser settings. Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the "global privacy control" signal. We will respond to this signal in a frictionless manner. If you configure this setting on your browser, certain features on our site may not work. To learn how to configure this setting, view <a href="here">here</a>.

Options you make are browser and device specific.

#### Specific Rights in Certain Jurisdictions

If you live in California or jurisdictions with similar laws, you may have additional rights, depending on your relationship with us. These rights are not absolute. In some situations, we may not be able to process your request. This may include if a legal exception applies. We'll let you know when or if a right doesn't apply to you. If you disagree with our decision, you can contact us as described at the end of this policy.

### These Rights Include:

- Access and Portability. To learn the categories of information we collect and use, and for those in California, the sources of collection
  and disclosure and the business purpose for the collection. You can request the specific pieces of the personal information we've
  collected.
- Correction. You have the right to ask us to correct inaccurate personal information.
- Deletion. You have the right to request that we delete your personal information. Please note that in some situations exceptions to
  your deletion right may apply.

#### **How it Works**

To exercise your rights, contact us at (877) 732-2848 or use the form available <a href="here">here</a>. You can also write us at: PO Box 261209 San Diego, CA 92196-1209. For verification purposes, we may request your first and last name, email address, phone number, and physical address you may have used when interacting with us. We may also ask for a copy of your government-issued ID. We match the information you provide with information we already have about you. We will not discriminate against you because you exercised your rights.

### **Third Party Agents**

If you are submitting on someone else's behalf, we may ask for additional verification. This may include providing a signed letter verifying your right to make this request.

### **Nevada Residents**

You may opt out of the future sale of your information to a third party so that they may license or sell that information. To do this contact us as described at the end of this Privacy Policy.

### **SECURITY PROCEDURES**

We use reasonable security measures as required by relevant law. No website is 100% secure, however. We cannot promise that your use of our sites or apps will be completely safe. We encourage you to use caution when using the internet. This includes not sharing your passwords.

## THIRD-PARTY SITES AND LINKS

We may link to other parties' tools. This might include their websites or apps. We are not responsible for practices employed by websites of other companies linked to from the Site or Services, nor the information or content contained therein. These third parties have their own privacy policies. Please remember that when you use a link to go from the Site and Services to another web site, our Privacy Policy is no longer in effect.

## INFORMATION COLLECTION FROM CHILDREN

Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us. You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line here.

## WE STORE DATA IN THE UNITED STATES

We are located in the United States. Our services are not intended for people who reside elsewhere. If you live outside of the United States, you understand and agree that we may transfer your information to the United States. Our site and businesses are subject to United States laws, which may not afford the same level of protection as those in your country. By submitting your information, you agree to the processing of it in the United States.

## **CONTACT US**

If you have any questions about this Policy or our data practices, please contact us at (877) 732-2848, or write to us at: San Diego County Credit Union PO Box 261209
San Diego, CA 92196-1209

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# **PRIVACY POLICY UPDATES**

We may make changes or updates to this Policy. All changes will also be posted on our website. Please check our site periodically for updates.

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