Updated: July 12, 2023

# California Consumer Privacy Act (CCPA)/ California Privacy Rights Act (CPRA) Policy

# Your Privacy: Overview

Your privacy is very important to Mission Federal Credit Union ("Mission Fed"). If you are a California resident, the California Consumer Privacy Act ("CCPA")/California Privacy Rights Act (CPRA) requires Mission Fed (collectively, "we", "us", or our") to provide additional information about the ways in which we collect, retain, process, and share your personal information. In addition, if you are a California resident, you have the right to make certain requests regarding your personal information.

The specific personal information that we collect, use, and disclose and the rights you have regarding this data varies based upon our relationship with you. For example, if you are a Mission Fed member, the information you provide to apply for or use the products and services you have requested is not covered by the CCPA. For more information about how we collect and share member information, please refer to our California Financial Privacy Policy and Federal Privacy Policy located at https://www.missionfed.com/privacy-policy/.

#### Rights Under the CCPA/CPRA

If you are a California resident, you have certain rights under the California Consumer Privacy Act including:

- 1) the right to request the personal information we collected about you ("right to know"); the categories of personal information we collected, and the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we shared your information.
- 2) the right to request that we delete your personal information, unless an exception applies which allows us to retain your information ("request to delete").
- 3) the right to request that we limit the sharing of your personal information ("request to limit").
- 4) the right to request that we correct your personal information ("request to correct").
- 5) The right to opt-out of the sharing of your data. (The sharing of information at Mission Fed is governed by the California Financial Information Privacy Act, another state privacy law. You can opt-out of information sharing by following the instructions on the Important Privacy Choices For Consumers notice.)
- 6) the right not to be discriminated against for exercising any of your rights under the CCPA.

<sup>\*</sup>Note a legally authorized and verifiable representative ("authorized agent") may make a request on your behalf.

The CCPA/CPRA also requires us to provide additional details about how we collect and handle categories of personal information. The following shows the types of personal information that we may collect about California residents who are subject to the CCPA/CPRA, the sources that provide the information we collect and the ways in which we use and disclose it.

# PERSONAL INFORMATION

<u>Categories of Personal Information</u>

| Category  | Examples   |
|---|--|
| Personal identifiers  | Real name; alias; Social Security number; passport number; other government issued number; driver's license number; postal address, telephone number; email address; account name; IP address; device identifier; online identifier; and other similar identifiers |
| Characteristics of protected classifications under California or federal law*           | Date of birth; age; gender; military or veteran status; marital status; nationality; race; ethnicity; citizenship; request for family care leave, pregnancy leave and leave for an employee's own serious health condition   |
| Education, Professional or Employment Information (if you apply for a position with us) | Job titles; salary information; references; employment information; details of your educational history; degrees   |
| Financial Details   | Bank account numbers; debit/credit card numbers; cardholder or accountholder name and details; transaction details   |
| Commercial Information  | Records of personal property; products and services purchased, obtained or considered; purchasing or consuming histories or tendencies   |
| Internet or other similar network activity  | Browsing history or information regarding your interaction with the Mission Fed website, mobile application or ad for Mission Fed products/services  |
| Sensory data  | Electronic or visual information (when visiting a Mission Federal branch location)   |
| Inferences  | Any information, data, assumptions or conclusions used to create a profile reflecting a consumer's preferences or characteristics.   |

<sup>\*</sup>Some information is only collected as required by law.

# Sources of Personal Information

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

- Information that you directly provide to Mission Fed (ex. when you contact Mission Fed via email, website, telephone or other means);
- Information that you choose to make public (ex. publicly visible social media profiles);

- Information from third parties who provide it to Mission Fed (ex. our members; credit reference agencies, background check agencies, government agencies and law enforcement authorities, consumer reporting agencies, other financial institutions); and
- Information collected through our Mission Fed website. When you visit our website, your device and browser may automatically disclose information (ex. device type, browser type, browser settings, IP address, pages browsed or other information).

#### How and Why We Use Your Personal Information

We may use or disclose the personal information we collect for any of the following purposes:

- Marketing/Prospecting: to market or advertise our products and services to you (subject to
  ensuring that any marketing/prospecting activities are conducted in compliance with applicable
  law);
- Operation of Website/Mobile App: operation and management of our website/mobile app including displaying information to you; communicating and interacting with you via our website and mobile app;
- IT Operations: to conduct IT security audits or other IT security related functions;
- Security: physical security of our branches and offices (including any video recordings or visitor logs) and electronic security (login records and access details);
- Legal Matters: to respond to law enforcement requests, court orders or other types of legal process including (subpoenas, levies or garnishments);
- Legal Compliance: to comply with Mission Fed's legal and regulatory obligations under applicable state and federal law; and
- Fraud and Risk Management: to detect, evaluate and prevent fraud or in connection with audits, compliance reviews, exams and other risk management functions.

#### Third Parties That We Share Your Personal Information With

- Governmental, law enforcement or regulatory authorities or agencies (when required to do so);
- Accountants, auditors, lawyers and other external professional advisors, subject to written agreements and confidentiality clauses;
- You and where appropriate, your family or your representatives;
- Third party service providers such as advertising agencies, payment service providers and other third parties used to provide products and services to Mission Fed members; and
- Other third parties, to comply with legal requirements such as to respond to subpoenas and court orders or to address fraud, security or technical issues.

#### Sale of Personal Information

Mission Federal does <u>not</u> sell personal information and has not done so in the past 12 months. As Mission Federal does not sell your personal information, we do not offer an opt-out.

#### Retention of Personal Information

Mission Federal will retain your personal information for as long as necessary to achieve the disclosed business purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory and other requirements.

#### How to submit CCPA/CPRA Requests to Know, Limit, Correct, or Delete

You may submit a CCPA/CPRA related request by using one of the methods outlined below:

- 1. If you are a member or have a relationship with Mission Fed, contact the Mission Fed Contact Center at 1-800-500-6328 or email the Contact Center at: membercare@missionfed.com.
- 2. Mail a written request to:

Mission Federal Credit Union Attn: Compliance Department P.O. Box 919023 San Diego, CA 92191-9023

#### Our Process to Verify Your Identity

We are required to verify your identity before responding to your request. How we verify your identity will vary depending on your relationship with Mission Fed.

- Members/Account Holders: If you are a Mission Fed member or have a password protected
  account with us, we may verify your identity using our existing authentication practices for your
  account. We may also require you to re-authenticate yourself before we disclose any personal
  information to you.
- **Non-Members /Non-Account Holders**: If you are not a Mission Fed member or do not hold a password-protected account with us, you will need to provide us with your name, address and date of birth.

We will generally avoid requesting any additional information from you to verify you. However, if we are unable to verify your identity based upon the information you provide or information we maintain, we may request additional information from you. If we are unable to verify your information, we will notify you. You may designate another person to submit a request on your behalf including an authorized agent or through a valid power of attorney (POA) that specifically authorizes someone to submit a CCPA request on your behalf. To process a request Mission Fed must be able to verify the identity of the agent and the validity of the request to ensure the security of information we hold. If Mission Fed cannot verify the agent or request, we are allowed under CCPA/CPRA to deny the request.

#### Response to Your CCPA/CPRA Request to Know

Mission Fed will confirm that we received your request within 10 days and provide a response to your request within 45 days. If we need additional time to respond, we will let you know and include an explanation of the reasons we need more time.

Any response we provide will cover the 12-month period prior to the date of your request.

Your request may be denied for various reasons including the following:

- You are not a resident of California
- You are a member and the information we hold is required to support your account, transactions
  or services you have requested, or the information is required by law.
- We have not collected your personal information in the past 12 months.

If we deny your request, we will notify you and provide an explanation of why your request is denied.

#### Response to Your CCPA/CPRA Request to Delete

Mission Fed will confirm that we received your request within 10 days and provide a response to your request within 45 days. If we need additional time to respond, we will let you know and include an explanation of the reasons we need more time.

Any response we provide will cover the 12-month period prior to the date of your request.

If we determine that we must comply with your deletion request, we will confirm the deletion with you before deleting any personal information. Once we have received your confirmation, we will delete your personal information from our records, aggregate your data or de-identify your data. Also, we will direct our service providers, as applicable, to do the same.

If we determine that we are not required to delete your personal information, we will notify you and provide an explanation of why your request is denied.

#### Response to Your CCPA/CPRA Request to Limit

Mission Fed will confirm that we received your request within 10 days and provide a response to your request within 45 days. If we need additional time to respond, we will let you know and include an explanation of the reasons we need more time.

Any response we provide will cover the 12-month period prior to the date of your request. If we determine that we must comply with your request to limit, we will confirm the data with you before making change. Once we have received your confirmation, we will limit the personal information shared with third parties. Also, we will direct our service providers, as applicable, to do the same.

If we determine that we are not required to limit your personal information, we will notify you and provide an explanation of why your request is denied.

#### Response to Your CCPA/CPRA Request to Correct

Mission Fed will confirm that we received your request within 10 days and provide a response to your request within 45 days. If we need additional time to respond, we will let you know and include an explanation of the reasons we need more time.

If we determine that the information on file should be corrected to match the information in your request, we will confirm the data with you before making change. Once we have received your confirmation, we will correct the personal information. Also, we will direct our service providers, as applicable, to do the same.

If we determine that a correction to your personal information is not needed, we will notify you and provide an explanation of why your request is denied.

# Changes to this Notice

We may change this notice from time to time. When we do, we will let you know by posting the revised notice on our Privacy Page with a new "Last Updated" date.

# Questions

If you have any questions regarding this privacy policy, you can reach out to us by using one of the methods outlined below:

- Call the Mission Fed Contact Center at 1-800-500-6328 or
- Mail your question to:

Mission Federal Credit Union Attn: Compliance Department P.O. Box 919023 San Diego, CA 92191-9023