

# Travis Credit Union California Consumer Privacy Act Policy

Last Updated: August 2024

This California Consumer Privacy Act Privacy Policy (Policy) for California Residents supplements the information contained in Travis Credit Union's (TCU's) Federal Privacy Policy. TCU has adopted this policy to comply with the California Privacy Act of 2018 (CCPA) and any implementing regulations, to the extent such laws and regulations are applicable to TCU. It serves to provide the consumer with a description of TCU's online and offline practices regarding the collections, use, disclosure, and sale of personal information. For more information, please see TCU's Federal Privacy Policy available at <https://traviscu.org/privacy-policy>.

## Your Rights under the CCPA

The CCPA provides California residents (consumers) with rights regarding their personal information. These rights include:

- The right to know about the personal information we collect, use, disclose, or sell;
- The right to request deletion of certain personal information;
- The right to opt out of the sale of personal information;
- The right to not suffer discrimination for exercising rights under the CCPA.

TCU does not sell consumers' personal information. This Policy describes what information TCU collects about consumers and why we collect it. The Policy also describes how consumers can exercise their rights under the CCPA to: (1) Request that we disclose the consumer information we have collected about them during the preceding 12 months; or (2) Request that we delete personal information that we have collected from them.

## Personal Information TCU Collects

The personal information that TCU collects will depend on your relationship with Travis Credit Union. Below is a list and descriptions of the categories of personal information that TCU has collected about consumers in the preceding 12 months:

Category	Examples
<b>Personal Identifiers</b>	Name, address, phone number, email address, social security or tax ID number, driver's license number, passport number, education, employment, bank account number, credit card number, debit card number, loan number,
<b>Protected Classification Characteristics under State or Federal Law</b>	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).
<b>Financial</b>	Personal financial statements, bank account number, income
<b>Commercial Information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing histories or tendencies

<b>Internet or Electronic Network Activity</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement
<b>Inferences to Create a Profile</b>	Credit scores, bankruptcy insight scores
<b>Geolocation Data</b>	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
<b>Sensory Data</b>	Audio, electronic, visual, thermal, or similar information.

**Sources from Which TCU Collects Personal Information:**

- Information you provide to TCU to:
  - Apply for or open an account, loan, or other product or service
  - Enter sweepstakes or contests, or subscribe to a newsletter or blog
  - Register for an educational webinar or seminar
- Credit-reporting agencies
- Third-party verification services
- Internet search engines, including social media, and internal network activity
- Security video
- Public records
- Government entities

**Purpose of Collecting Personal Information:**

- Verify your identity
- Contact you regarding application status and process
- Maintain security
- Assign computers and software programs
- Provide you information on financial products and services
- Maintain your accounts and services
- Assess your qualifications for a business account or loan
- Assess your financial standing with TCU
- Process your sweepstakes or contest entry
- Process release authorizations
- Process notification alerts
- Comply with equal employment opportunity laws
- Comply with equal opportunity lending laws

**Sharing and Disclosure of Personal Information**

TCU does not share or disclose your personal information except as required by law or allowed for a business purpose. TCU shares or discloses personal information with service providers who assist the credit union in determining your eligibility for and servicing your products and services; or for employment services. TCU contractually prohibits these service providers from selling, sharing, or using

your personal information for any other purposes. TCU shares your personal information with attorneys and auditors for risk analyses and mitigation purposes.

#### **Right to Discontinue the Sale of Your Personal Information**

TCU does not sell the personal information of any consumers, irrespective of age, to any third party.

#### **Right to Have Your Information Deleted**

You may request deletion of your personal information by contacting us in one of the ways described below. TCU may deny your deletion request if retaining the personal information 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 TCU's ongoing relationship with you.
- Perform a contract between TCU 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.

#### **Right to Know About Personal Information Collected, Used, or Disclosed**

As a consumer, you have the right to request that TCU disclose certain information to you about collection and use of your personal information within the preceding 12 months. Once TCU receives and confirms your verifiable request, and confirms the information you seek is covered by CCPA, the credit union will disclose to you:

- The categories of personal information collected about you;
- The categories of sources for the personal information collected about you;
- TCU's business purpose for collecting or selling that personal information;
- The categories of third parties to whom TCU disclosed the category of personal information for a business purpose; and
- The specific pieces of personal information collected about you in a form that you can take with you.

In order to ensure the security of confidential non-public data there is certain information that TCU will not disclose to you. This information includes but is not limited to Social Security number, driver's license number or other government-issued identification number, financial account number, account password, or security questions and answers. Also, TCU will not provide specific pieces of personal information if the disclosure creates a substantial and unreasonable risk to the security of that personal information, your account with TCU, or the security of our systems or networks.

## **Exercising Request to Know and Deletion Rights**

To exercise the right to know and deletion rights described above, please submit a verifiable request to TCU using one of the following methods:

- Calling TCU at **(800) 877-8328**;
- Submit your request online <https://www.traviscu.org/compliance/ccpa>
- TCU members can log into Online Banking and submit a form by secure email;
- Visit a TCU branch; or
- Mail your request to: Travis Credit Union, Attn: Compliance Department, P.O. Box 2069, Vacaville, CA 95696

You may make a verifiable request twice within a 12-month period. TCU cannot respond to your request or provide you with personal information if the credit union cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable request does not require you create an account with TCU. The Credit Union will only use the personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

## **Process Used to Verify Requests**

If your information is located and subject to disclosure under the CCPA, TCU will provide you the information after taking steps to verify your identity as required under the CCPA, and to protect you and the Credit Union from fraud and identify theft. There are several ways your identity may be verified. Accountholders may be verified by logging into Online Banking and submitting the CCPA request form by sending an email through Secure Messaging. Accountholders that do not have Online Banking may be verified by answering questions via a telephone conversation with a TCU Representative. TCU may also request to see your Driver's License or other government issued identification in person if at a branch or via DocuSign when submitting the CCPA request form online. This information will only be used for verification purposes. If we cannot verify to a reasonable degree of certainty that you are the consumer to whom our information relates, the CCPA specifies that we deny the request for information.

## **Requests From Authorized Agents**

When TCU receives a verifiable request from your "authorized agent," which is any person or legal entity registered with the California Secretary of State that you have authorized to act on your behalf, the credit union will require:

1. Submission of a written 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 TCU; or
2. Require your authorized agent to furnish a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and require the authorized agent to verify its own identity to TCU.

TCU 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 the credit union.

### **Response Timing**

TCU 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 TCU requires more time, we will inform you of the reason and extension period in writing. If you have an account with TCU, the credit union will deliver a written response to that account address. If you do not have an account, the response will be delivered by mail or electronically, at your option. Any disclosures TCU provides will only cover the 12-month period preceding the verifiable consumer request's receipt. The response will also explain the reasons TCU cannot comply with a request, if applicable.

### **Right of Non-Discrimination**

TCU will not discriminate against you for exercising any of your CCPA rights. TCU will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price for goods or services or a different level or quality of goods or services

### **Contact Information**

If you have any questions or comments about this policy, the ways in which TCU collects and uses your personal information, your choices and rights regarding such use, or wish to exercise your rights, visit [traviscu.org](https://traviscu.org) or call **800-877-8328**.