GLOBAL CREDIT UNION

European Union Privacy Notice

About this notice

This notice describes your rights and how we process your personal data under the European Union's General Data Protection Regulation (known as the "GDPR") and supplements the information in our other privacy notices.

This notice is provided jointly by the organizations that make up Global ("we" or "us"), including:

- Global Federal Credit Union;
- Global Credit Union Home Loans, LLC (including Procura Mortgage Company); and
- Global Credit Union Insurance Brokers, LLC (including Global CU Insurance Agency, LLC).

Global's main offices are located in the United States, at:

4000 Credit Union Drive
Anchorage, Alaska 99503

To contact the Data Protection Officer for these organizations, please email dpo@globalcu.org.

The definitions used in this notice may differ from definitions in other notices and disclosures due to variations in the definitions provided by law. For purposes of this notice:

- **Personal data** means any information relating to an identified or identifiable individual.
- **Data subject** means a person who can be identified, directly or indirectly, and linked to data.
- **Special categories of personal data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.
- **Processing activity** or **processing** means any action taken involving personal data, including collection, use, alteration, destruction, retention, or disclosure.
- **Controller** means an entity (such as a company) which determines the purposes and means of processing personal data, whether alone or jointly with another controller.
- **Processor** means an entity (such as a company) which processes personal data on behalf of a controller, whether directly or through other processors.

Requirement to provide personal data

You are under no legal or regulatory obligation to provide us your personal data or provide authorization for us to obtain your personal data. If you do not provide the personal data we request, depending on the information and context we will either be unable to provide products, services, or employment or unwilling to do so due to legal or regulatory risk.

If we collect your personal data solely for purposes other than to provide products, services, or employment or manage related legal or regulatory risk, we will inform you of such purposes and we will not require that you provide this personal data to obtain products, services, or employment.

Your rights

Subject to some limitations, you have the right to:

- Know whether Global is processing your personal data;
- Access and obtain a copy of your personal data, including in a structured, machine-readable format, and in cases where the processing is automated and based on consent or a contract, to have your personal data transmitted directly to another controller;
- Have us correct (or rectify) your personal data;
- Have us delete your personal data and direct our processors to do the same (known as the *right to erasure* or the *right to be forgotten*);
- Object to processing of your personal data based on our legitimate interests;
- Have us restrict processing of your personal data if (and to the extent that):
  - You contest the accuracy of the personal data, until we're able to verify the accuracy;
  - You object to processing conducted for our legitimate interests, until verification as to whether our interests override your objections;
  - The processing is unlawful, but you oppose erasure; or
  - We no longer need the data for our purposes of processing, but you require the data for your legal purposes;
- Object to a decision based solely on automated decision-making or profiling, except where necessary for entering into or performing a contract between you and Global;
- Withdraw consent for processing at any time, without affecting the lawfulness of processing based on consent prior to withdrawal and only where we rely upon consent as the legal basis for processing; and
- Lodge a complaint with an appropriate supervisory authority within the European Union regarding our processing of your personal data.

To exercise your rights under the General Data Protection Regulation, you can:

- Visit www.globalcu.org/privacy and submit a privacy rights request;
- Call our Member Service Center at 1-800-525-9094; or
- Visit a Global branch.

Automated decision-making and human review

We use automated decision-making for many purposes:

- Security and fraud prevention. Automated decision-making is used for security and fraud prevention purposes, for example to detect spam, fraudulent use of debit and credit cards, and to maintain the security of our information systems. Where decisions may have a legal or comparable effect, they are subject to human review.
- Marketing decisions. Automated decision-making is used to determine targeting in marketing and advertising. Where decisions may have a legal or comparable effect, they are subject to human review.
- Lending decisions. Automated decision-making and profiling are used for lending purposes, for example to obtain and evaluate your credit score when you apply for a loan. Where these decisions may have a legal or comparable effect, they are subject to human review, and profiles used in these decisions are subject to human-led dispute resolution processes.
- Decisions regarding eligibility for membership and for payment and deposit products. Automated decision-making is used to determine your initial eligibility for membership, as well as your initial and ongoing access to payment and deposit products. Where these decisions may have a legal or comparable effect, they are subject to human review, and profiles used in such decisions are subject to human-led dispute resolution processes.
- Employment decisions. Automated decision-making is used in employment screening, for example to determine whether an individual is bondable. Where these decisions may have a legal or comparable effect, they are subject to human review.

Human review may result in upholding the decision, a reversal or modification of the decision, or the ability to reattempt the transaction in question.

Global information practices

Purposes and legal bases for processing your personal data

Category of processing activity	Legal basis for processing
Providing our products and services. For example, to carry out payment transactions, extend credit, or to provide services related to your account.	» **Fulfilling contracts.** » **Legal obligation**. » **Legitimate interests**. Our interest in remaining stable and profitable so we can continue to serve our members.
Marketing our products and services. This includes sharing within our group of affiliated companies for marketing purposes, joint marketing agreements with nonaffiliated companies, online advertising, and analytics services provided by others.	» **Legitimate interests.** Our interest in remaining stable and profitable so we can continue to serve our members.
Internal business and technical analysis. For example, to optimize or troubleshoot existing products and services, or to develop new products and services.	» **Legitimate interests.** Our interest in improving existing operations, products, and services and in offering new products and services to best serve current and future members. » **Legal obligation.** Such as our obligation to maintain sound management practices.
Legal and regulatory compliance purposes. For example, to respond to subpoenas or analyze transaction and demographic data to ensure fair and responsible practices in lending and employment. *Special Categories*. This includes processing of special categories of personal data, particularly racial or ethnic origin.	» **Legal obligation.** » **Legitimate interests.** For example, our interest in complying with applicable laws and regulations or in pursuing legal claims. » **Special categories.** Processing is necessary for a substantial public interest, to respond to regulatory requirements, and to support or defend legal claims.
Security and risk management. Including prevention, detection, investigation, and redress of financial and other crimes. *Special Categories*. This includes processing of special categories of personal data.	» **Legitimate interests.** Our interest in preventing financial losses, disruption or degradation of operations, and improper disclosure, modification, or destruction of data. » **Legal obligation.** For example, our obligation to protect your personal data. » **Vital interests.** » **Special categories.** Processing is necessary for substantial public interests, responding to regulatory requirements, to protect the vital interests of an individual, or to support or defend legal claims.
Recruiting, hiring, and managing employees and contractors. *Special Categories.* This includes processing of special categories of personal data, for example to help ensure fairness in employment practices.	» **Fulfilling contracts.** » **Legal obligation.** » **Legitimate interests.** Our interest in hiring and retaining appropriate individuals and in operating safely and efficiently.
Provision of employment benefits to Global employees. For example,health insurance coverage and other elective benefits related to health. *Special Categories.* This may include the processing of special categories of personal data, particularly data concerning health, genetics, sex life, or sexual orientation.	» **Fulfilling contracts.** » **Legitimate interests.** For example, our interest in maintaining the efficiency and integrity of health-related benefits programs. » **Special categories.** Processing is based on consent, necessary to respond to regulatory requirements, or to support or defend legal claims.

Sources of personal data

We may obtain your personal data from:

- You, your representatives, your family, and your business associates;
- Government agencies, public records, and other public sources, including social media;
- Our business partners, such as payment networks, credit reporting agencies, and other organizations which maintain personal information about you; or
- Our affiliates.

Categories of personal data obtained from sources other than you or your representatives

Where we obtain your personal data from other sources, this may include:

- Contact information and identity;
- Financial transactions;
- Information regarding assets, including collateral;
- Creditworthiness, credit capacity, reputation, and legal or criminal background, as permitted;
- Education, professional, and business background;
- Social media and other online activity, including interaction with our marketing and advertising activities;
- Information related to your interaction with our mobile applications, websites, and other Global information systems;
- Location, device, or browser information; or
- *Employees only:* information related to the provision of health insurance coverage and other elective benefits, including special categories of personal data.

Recipients of personal data

We may disclose your personal data:

- Within our group of affiliated companies as joint controllers, to the extent otherwise permitted by law;
- To our processors, which may include some disclosures within our group of affiliated companies;
- To credit reporting agencies and similar organizations which maintain individual profiles;
- To government entities as required by laws or regulations;
- To legal counsel or parties to legal actions to support, defend, or respond to legal claims or processes; or
- In connection with mergers and acquisitions and other transfers of accounts or relationships.

International transfers

In the course of our processing activities, we may transfer your personal data to our processors or other controllers outside the European Union, in particular to the United States where our servers and operations are principally located. When we do this, we will ensure appropriate legal and technical protection for your personal data.

In the absence of a current adequacy decision, transfers to the United States will be based on Article 46 contractual terms known as *standard contractual clauses* as well as other mechanisms under Article 49.

Data retention

We retain your personal data according to our retention policies for as long as reasonably necessary:

- To maintain our relationship and provide our products, services, or benefits to you;
- For compliance and legal purposes;
- For security, fraud prevention, and dispute resolution purposes;
- To market our products and services to you;
- To manage and improve our products, services, systems, and operations, and to develop new products and services; or
- For other related purposes only to the extent they are compatible with the purposes and context of collection.

Retention periods vary by the type of transaction, interaction, or relationship for which the personal data was collected.