

# Privacy Notice for the California Consumer Privacy Act

## About This Notice

### Who is providing this notice?

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 dba Procura Mortgage Company); and
- » Global Credit Union Insurance Brokers, LLC.

It describes how we collect, use, retain, and disclose the personal information of California residents (“you”) and summarizes your rights under the California Consumer Privacy Act of 2018 (CCPA). This notice supplements the information in our other privacy notices.

This notice applies only to individual California residents and their personal information. Definitions provided in this notice may vary from definitions in other notices.

### What is Personal Information?

For purposes of this notice:

- » **Personal information** is any information that is, or reasonably could be, linked to a particular individual or household. This information is divided into several categories under the CCPA.
- » **Sensitive personal information** is personal information that falls into certain special categories under the CCPA.

### How Do We Secure Your Personal Information?

Keeping your personal information secure and private is among our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, and organizational safeguards to protect your personal information against improper access, disclosure, alteration, retention, and destruction.

### What Personal Information is Covered?

The CCPA exempts from most of its requirements certain information, activities, or entities already protected by other laws. Much of the personal information we collect is already regulated by these or other laws. For example, the CCPA exempts:

- » Information subject to the requirements of the Gramm-Leach-Bliley Act (GLBA), which applies to most personal information collected while providing financial services for personal or household purposes;
- » Activities governed by the Fair Credit Reporting Act (FCRA), such as providing your personal information to credit reporting agencies or obtaining credit reports about you; and
- » Information subject to the Driver’s Privacy Protection Act.

# How we Collect, Use, Retain, and Disclose Personal Information

The specific personal information that we collect, use, retain, and disclose, and the purposes for disclosure, may vary depending on the relationship you have with Global, including the products or service you obtain from us.

## Why We Collect Your Personal Information

We use your personal information in many ways to operate, manage, and develop our business and to provide our products and services to you, including for the following:

- » Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- » Securing our information systems, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- » Undertaking activities to verify or maintain the quality or safety of services controlled by us, and to improve, upgrade, or enhance the service controlled by the business;
- » Debugging to identify and repair errors that impair existing intended functionality;
- » Short-term, transient use where the information is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- » Marketing and advertising our products and services;
- » Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- » Undertaking internal research for technological development and demonstration; and
- » Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

## Sources of Personal Information

We collect or have collected your personal information from sources that may include, depending on your relationship with Global:

- » You, your representatives, your family, and your business associates;
- » Service providers, contractors, and third parties;
- » Public records, including federal, state, local government sources;
- » Our affiliates;
- » Social media; and
- » Our websites and mobile apps.

## Personal Information

We collect, use, and disclose personal information for a business purpose as follows, and have done so over the previous 12 months:

Categories of Personal Information	Do we collect and use?	Do we disclose for a business purpose?
Identifiers, such as name, government-issued identifiers such as Social Security number, account numbers, email address, or online identifiers such as IP address.	Yes	Yes
Other records protected under California law, including insurance or financial information.	Yes	Yes
Characteristics of protected classifications under California or federal law, such as sex and marital status.	Yes – for example, when you apply for employment or insurance.	Yes
Commercial information, such as transaction information and purchase history.	Yes	Yes
Biometric information, such as voice recordings or behavioral characteristics.	Yes – for example, we may record telephone calls and interactions in our branches.	Yes
Internet or network activity information, such as browsing history.	Yes	Yes
Geolocation data, such as device location and Internet Protocol (IP) address location.	Yes – when you visit our websites or branches or use your credit or debit card.	Yes
Audio, electronic, visual, and similar information, such as call and video recordings.	Yes – for example, when you call us or visit a branch or ATM.	Yes
Professional or employment-related information, such as work history and prior employer.	Yes – for instance, when you submit an application for a loan or employment.	Yes
Education information, such as student records and directory information.	Yes – such as when you submit your resume or transcripts as part of an application for a loan or employment, or when you apply for a good student discount.	Yes

## Sensitive Personal Information

We collect, use, and disclose your information for a business purpose as follows, and have done so over the previous 12 months:

Categories of Sensitive Personal Information	Do we collect and use?	Do we disclose for a business purpose?
Social Security, driver's license, state identification card, or passport number.	Yes – including to uniquely identify you and for tax reporting purposes.	Yes
Account access information such as username, or financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	Yes – for example, to provide you with debit and credit card services and online access to your account.	Yes
Geolocation within the area of a circle with a radius of 1,850 feet.	Yes – for example, through electronic activity, provision of services, or other interactions.	Yes
Racial or ethnic origin, religious or philosophical beliefs, or union membership.	Yes – for example, to comply with equal opportunity laws in lending and employment.	Yes
The contents of messages (such as letters, email, or text) except where we are the intended recipient of the communication.	Yes – for example, messages you send to other organizations about our products or services or your interactions with us.	Yes
The processing of biometric information for the purpose of unique identification.	Yes – for example, we may use call recordings to identify individuals.	Yes
Information collected and analyzed concerning health.	Yes – employees only. Our health insurance provider may collect and use this information to provide health insurance services.	Yes
Information collected and analyzed concerning sex life or sexual orientation.	Yes – employees only. Our health insurance provider may collect and use this information to provide health insurance services.	Yes

You have the right to limit our use and disclosure of your sensitive personal information.

## Retention Periods

For each of the categories of personal information and sensitive personal information above, we retain the information according to our retention policies for as long as necessary:

- » To provide our products, services, or benefits to you;
- » For compliance and legal purposes;
- » For security and fraud prevention purposes;
- » To facilitate resolution of credit and transaction disputes;
- » To market, maintain, and improve products, services;
- » To maintain and improve systems, operations, and facilities;
- » To develop new products and services; and
- » For other purposes compatible with the purposes and context of collection.

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

## Third-Party Disclosure

Under the CCPA, a third party is any person or company except Global Federal Credit Union, our similarly branded affiliates, or our contractors and service providers.

We may disclose your personal information to the following categories of third parties:

- » Businesses which provide us with services related to digital marketing, including infrastructure, ad placement, and analysis; and
- » Government entities as required or permitted by laws or regulations.

## Sharing and Selling

For purposes of this notice:

- » **Sharing** means disclosure to a third party for purposes of cross-context behavioral advertising.
- » **Selling** means disclosure to a third party in exchange for anything of value.

If you are 16 years old or older, we can sell or share your personal information unless you opt out. However, if we know that you are less than 16 years old, we must obtain consent to share or sell your information. If you are 13-15, you can provide consent. If you are under 13, your parent or guardian can provide consent.

We share your personal information for purposes of cross-context behavioral advertising unless you tell us not to or we know you are less than 16 years old. We share this information with third parties who place ads or help us optimize ad placement. The information we share is focused on improving the relevance of the advertising you see, for example to avoid advertising services to you that you already receive from us.

To the extent that sharing for purposes of digital advertising also constitutes selling, we sell your personal information. However, we will never disclose your personal information in exchange for money. We disclose your personal information under these circumstances only to improve the relevance of the behavioral advertising you receive and measure its effectiveness.

In the past 12 months, we have shared or sold the following categories of personal information:

- » Identifiers, including your name, phone number, email address, and IP address;
- » Network activity, such as the fact that you visited our website; and
- » Geolocation, including country and ZIP code.

# Your Privacy Rights

Subject to some limitations, you have the right to:

- » Opt out of the sale and sharing of your personal information.
- » Limit our use and disclosure of your sensitive personal informations.
- » Know what information we have collected about you; the categories of sources from which we collect personal information; our purposes for collecting, sharing, or selling that information; and the categories of third parties to whom we disclose personal information.
- » Know what information we have sold or shared about you.
- » Obtain a copy of your personal information from us.
- » Request that we erase your personal information and direct those we've provided with your personal information to do the same.
- » Request that we correct personal information about you.
- » Be free from discrimination or retaliation for exercising your rights under the CCPA.

## How We Fulfill Access, Correction, and Deletion Requests

We will acknowledge receipt of your requests for access, correction, or deletion of your personal information.

To verify your identity or to verify your authorization to make a request on behalf of another person, we may request further information or action from you. If we cannot adequately verify your identity or your authorization to submit a request on behalf of another person, we may decline all or part of your request. We will notify you of our decisions. Verification helps protect you from identity theft or other violations of your privacy. At our discretion, and depending on the risks posed by a request, we may ask that you verify access to your email address or phone number, provide your photo identification, provide notarized documents to identify you or to demonstrate your authority to make a request on another individual's behalf, or make your request in person.

If we cannot complete your request within 45 days, we will notify you that we are extending the request and provide you with an explanation for the delay. We may take up to an additional 45 days, for a total of 90 days from the date you submit your request.

If your request is excessively difficult, we may reach out to you to gather more specific information about your request. If you make unfounded or excessive requests, we may decline them.

## How You Can Exercise Your Rights

To exercise your rights to deletion, correction, or access to your personal information, you can:

- » Visit [www.globalcu.org/privacy](http://www.globalcu.org/privacy) to submit a Privacy Rights Request;
- » Call our Member Service Center at 800-525-9094; or
- » Visit a Global branch.

You can opt out of the sale and sharing of your personal information or limit our use and disclosure of your sensitive personal information by:

- » Setting your browser to send an Opt Out Preference Signal (also known as a Global Privacy Control) or
- » Visiting [www.globalcu.org/privacy](http://www.globalcu.org/privacy) or clicking the link on our website that says "Do Not Sell or Share My Personal Information and Limit the Use of My Sensitive Personal Information."

## Questions or Concerns

You may contact us with questions or concerns about this notice and our information practices by:

- » Emailing us at [memberservice@globalcu.org](mailto:memberservice@globalcu.org) or
- » Calling our Member Service Center at 800-525-9094.

## Changes to this Notice

We may change this notice from time to time. When we do, we will post the revised version on our websites with a new date.