

## California Consumer Privacy Notice

This Privacy Policy for California Consumers supplements the information contained in the Privacy Notice of Kemba Credit Union (“we”, “us” or “our”) and applies solely to consumers who reside in the State of California (“residents”, “consumers” or “you”). Any terms defined in the California Consumer Privacy Act of 2018, as amended, and its implementing regulations (the “CCPA”) have the same meaning when used in this notice. This privacy policy for California residents can be found online at <https://www.kemba.com/privacy-notices.html>.

Personal Information for purposes of the CCPA does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, including:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  - Personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and Driver’s Privacy Protection Act of 1994.

### 1. CATEGORIES OF PERSONAL INFORMATION WE COLLECT

The following chart describes the categories of Personal Information we have collected within the previous twelve months (some categories may overlap).

Category	Examples	Collected ?
<b>Identifiers</b>	A full real name or alias, postal address, unique personal identifier, Social Security Number, driver's license number or state identification card number, email address, telephone number, member number or account name; or other similar identifiers.	Yes
<b>Personal Information Categories listed in California Customer Records statute (Cal. Civ. Code 1798.80(e))</b>	A real name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or other financial information, medical information, or health insurance information.	Yes

<b>Protected classification characteristics under state or federal law</b>	Examples include age, 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.	Yes
<b>Commercial Information</b>	Records of personal property, products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.	Yes
<b>Biometric Information</b>	Biometric derived information, typically used for identity authentication purposes, including information such as fingerprint, facial recognition patterns, voice prints and retina images.	Yes
<b>Internet or other network activity</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
<b>Geolocation Data</b>	Information identifying consumers' physical location or movements.	Yes
<b>Sensory Data</b>	Audio, electronic, visual, thermal, olfactory or other similar information typically used for consumer identification or verification purposes.	Yes
<b>Professional or Employment Info</b>	Current or prior job history or performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.	Yes
<b>Non-public Education Information (per the Family Educational Rights and Privacy Act)</b>	Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes
<b>Inferences drawn from other personal information collected</b>	Consumer profile information that is used alone or in combination, could suggest consumer product marketing preferences, or other similar products and services interest. Profile information may include psychological trends, predispositions, behavior, intelligence, attitudes, abilities, and other similar characteristics.	Yes

## 2. Categories of Sources from which Personal Information is Collected

Kemba collects personal information from the following categories of sources:

- Directly from members, applicants, agents, visitors, and other users. For example, from documents our members provide us related to services for which they engage us.
- Indirectly from members, applicants, agents, visitors, and other users. For example, through information we collect from our members in the course of providing services to

them.

- Directly and Indirectly from activity on our website or Mobile App. For example, from submissions through our website portal or website usage details.
- From third-parties that we interact with in connection with the services we provide or our marketing efforts.

### **3. Use Your Personal Information**

Kemba may use or disclose personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts and other notices concerning our products, services, events, or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- To detect security incidents and to protect against, prevent, or prosecute malicious, deceptive, fraudulent, or illegal activity.
- As necessary or appropriate to protect the rights, property or safety of us, our employees, members, or others.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets.

Kemba will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **4. Sharing and Sale of Personal Information**

Kemba does not sell your personal information as defined under the CCPA and all California residents are automatically opted-out of any sale of information. In the preceding twelve months, we have not sold any personal information.

Kemba discloses your personal information for a business purpose or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter into a contract with the recipient that describes the purpose and requires the recipient to keep that personal information confidential and not use it for any purpose except performing the contract.

The categories of personal information shared for a business purpose in the previous 12 months include:

- Identifiers
- California Customer Records personal information categories
- Protected classification characteristics under California or federal law
- Customer Account Details/Commercial Information
- Professional or Employment Information
- Commercial Information

We disclose your personal information for a business or commercial purpose to the following:

- Our affiliates
- Service Providers
- Third Parties to whom you authorize us to disclose your personal information in connection with products or services we provide to you

## **5. Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes those CCPA rights and explains how to exercise those rights.

Your rights and choices in this Section 5 do not apply to you:

- If you are not a California resident;
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and Driver's Privacy Protection Act of 1994.
- To the extent consumer information is de-identified or aggregated.
- To the extent information we have is publicly available from government records.

If you are a California resident, you have the right to:

- A. Request that we disclose to you the following personal information covering the 12 months preceding your request ("right to know"):
  - The categories of personal information that we collected about you and the categories of sources from which we collected such personal information;
  - The business or commercial purpose for collecting personal information about you;
  - The categories of personal information about you that we disclosed to third parties for a business purpose and the categories of third parties to whom we disclosed such Personal Information; and
  - The specific pieces of personal information we collected about you.
  - A list of categories of personal information sold about you in the previous 12 months.
- B. Request that we delete personal information that we collected from you, subject to applicable exceptions ("right to delete"). We may deny your deletion request if retaining the information is necessary for us or our service provider to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
  - Debug products or services to identify and repair errors that impair existing intended functionality.
  - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - Engage in public or peer-reviewed research in the public interest.
  - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
  - Comply with a legal obligation.
  - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- C. Be free from unlawful discrimination for exercising your rights under the CCPA.

## **6. Exercising Your Rights**

You may exercise the rights described above by contacting Kemba:

- Call the Service Center toll free at 1-800-825-3622.
- Submit a request via email to: [marketing@kembacu.org](mailto:marketing@kembacu.org).

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. You have the right to designate an authorized agent to make a request under the CCPA on your behalf. If you wish to designate an authorized agent, Kemba requires submission of a valid power of attorney with express authority to exercise powers under the CCPA. A verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, or you are an authorized representative of said person; AND
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to the request.

We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we may not honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another individual or where the Personal Information that we maintain about you is not subject to the CCPA's rights. We

will not provide Social Security Numbers, driver's license numbers or government-issued identification numbers, financial account numbers, healthcare or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security. We will advise you in our response if we are not able to honor your request and explain the reason(s) we cannot comply with the request.

We will attempt to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period. Any disclosure we provide will only cover the 12-month period preceding our receipt of the verifiable request. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine your request warrants a monetary charge, we will tell you why we made the determination and provide you with a cost estimate before completing your request.

## **7. Non-Discrimination**

Kemba will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the California Consumer Protection Act or applicable law, Kemba will not:

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

## **8. Changes to this Privacy Notice**

Kemba reserves the right to amend this CCPA privacy notice at its discretion at any time. The current version of this privacy notice will be posted on Kemba's website.

Contact Information:

If you have any questions or comments about this notice, the ways in which Kemba collects and uses your personal information, your choices and rights regarding such use, please call us toll-free at 1-800-825-3622.

CCPA Policy Updated/Revised:  
June 2020