

California Consumer Privacy Act/California Privacy Rights Act Disclosure

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 by the California Consumer Privacy Act of 2020 (“CCPA”), including and pursuant to the California Privacy Rights Act of 2023 (“CPRA”) and its implementing regulations (the “CCPA” and “CPRA”) 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-notice.html>.

Personal Information for purposes of the CCPA and CPRA does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA and CPRA’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 ?
Identifiers	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
Personal Information Categories listed in California Customer Records statute (Cal. Civ. Code 1798.80(e))	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

Protected classification characteristics under state or federal law	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
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
Biometric Information	Biometric derived information, typically used for identity authentication purposes, including information such as fingerprint, facial recognition patterns, voice prints and retina images.	Yes
Internet or other network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
Geolocation Data	Information identifying consumers' physical location or movements.	Yes
Sensory Data	Audio, electronic, visual, thermal, olfactory, or other similar information typically used for consumer identification or verification purposes.	Yes
Professional or Employment Info	Current or prior job history or performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.	Yes
Non-public Education Information (per the Family Educational Rights and Privacy Act)	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
Inferences drawn from other personal information collected	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

The categories of sources from which we may collect Personal Information depends on our relationship or interaction with a specific Covered Individual and the business purpose for which the Personal Information is collected.

During the 12-month period prior to the Last Updated date of the Disclosure, Kemba may have obtained Personal Information about you from the following 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. Collection and Use Your Personal Information

The purposes:

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

- Performing services, including maintaining or servicing accounts, providing member service, processing, or fulfilling orders and transaction, verifying member information, processing payments, providing financing, providing analytics, providing storage, or providing similar services;
- Providing advertising and marketing services to members, except for cross-context behavioral advertising (which is addressed in the “Sharing of Personal Information” section of this disclosure”);
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with Kemba;
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Managing career opportunities with Kemba;
- 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; and
- To evaluate or conduct merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all 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 CRPA, 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 and CPRA provides California residents with specific rights regarding their personal information. This section describes those CCPA and CPRA 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. Right to Request and Receive Information Disclosures:

- A business that controls the collection of your personal information must, at or before the point of collection, inform you about:
 - The categories of personal information to be collected and the purposes for which the categories of personal information are collected or used, and

whether such personal information is sold or shared;

- The categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used and whether such information is sold or shared;
- The length of time the business intends to retain each category of personal information sensitive personal information, provided that such information is not retained for longer that is reasonably necessary for the disclosed purpose for which the information was collected.

B. Request to Delete Personal Information: (“Right to Delete”):

- You have the right to request deletion of personal information that we collect from you. We must disclose the right to request the deletion of your personal information. Accordingly, we must receive verifiable your request for deletion must delete your personal information from our records and direct any service provider to maintain your personal information in order to:
 - Complete the transaction which your personal information was collected, fulfill the terms of a written warranty or product withdrawal conducted in accordance with federal law, provide a good or service that you requested, or reasonably anticipated by you within the context of a business’s ongoing business relation with you, or otherwise perform a context of a business’s ongoing business relationship with you, or otherwise perform our contract you;
 - Help ensure security and integrity to the extent that the use of your personal information is reasonably necessary and proportionate for those purposes;
 - Debug to identify and repair errors that impair existing intended functionality;
 - Exercise free speech, ensure the right or another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
 - Comply with California Communications Privacy Act;
 - Engage in public or peer-reviewed scientific, historical, or statistical research that adheres to all other applicable ethics and privacy laws, when the deletion of your information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent;
 - Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information; or
 - Comply with a legal obligation.

C. Request to Correct Inaccurate Personal Information:

- You have a right to request the correction of any inaccurate personal information, taking into account the nature of the personal information and the purposes of processing the personal information.
- Upon receiving your verifiable request to correct inaccurate personal information, we

shall use commercially reasonable efforts to make any necessary correction(s).

D. Right to Know what Personal information is Being Collected and Right to Access Personal Information:

- You have the right to request that a business that collects your personal information disclose the following information:
 - The categories personal information we have collected about you;
 - The categories of sources from which the personal information is collected;
 - The business or commercial purpose for collecting, selling, or sharing personal information;
 - The categories of third parties to whom the business discloses personal information; and
 - The specific pieces of personal information it has collected about you.

E. Request that you Opt-Out of Sharing Personal Information (“Right to Opt-Out”):

- You have the right, at any time, to direct us to not sell or share your personal information;
- In case of a minor, we are prohibited from sharing the minor’s personal information if we have not received consent to do so.

F. Right to Limit the Use and Disclosure of Sensitive Personal Information to:

- You have the right, at any time, to direct us to limit the use and disclosure of your Sensitive Personal Information to only what is necessary to:
 - Perform the services or providing goods reasonably expected by an average consumer who requests such goods or services;
 - Effectuate the business purpose of helping to ensure security and integrity to the extent the use of the consumers’ personal information is reasonable, necessary, and proportionate for that purpose;
 - Meet the business purpose of short-term or transient use, including but not limited to non-personalized advertising shown as part of your current interaction with the Credit Union;
 - Fulfill the business purpose for the Credit Union’s performance services, including maintaining or servicing your account, providing financing, providing analytic services, providing storage, or providing similar services and
 - Achieve the business purpose of undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Credit Union, and to enhance, improve, or upgrade the service or device owned, manufactured, manufactured for, or controlled by the Credit Union.

G. 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 personal information;

- The business or commercial purpose for collecting and sharing 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 or shared about you.
- H. Be free from unlawful discrimination for exercising your rights under the CCPA.

6. Non-Discrimination

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

7. 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.

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/CRPA. 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.

8. Changes to this Privacy Notice

Kemba reserves the right to amend this CCPA/CPRA 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.

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