



MEMBERS 1st
FEDERAL CREDIT UNION

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“Notice”).

At Members 1st Federal Credit Union, protecting the personal information of our members is a priority. In response to the California Consumer Privacy Act of 2018 (CCPA), and the California Privacy Rights Act of 2020 (CPRA), Members 1st has created this additional privacy notice to supplement our current Consumer Privacy Policy. This Notice applies only to visitors, users, and others who reside in the State of California (“consumers” or “you”).

Collection and Disclosure of Personal Information

When you visit our website, or use our online services, Members 1st may collect information about you that is classified as personal information under the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”). The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA and CPRA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act (“GLBA”) since that statute contains its own privacy protections). For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [Consumer Privacy Policy](#).

In the past 12 months, we have collected the following categories of personal information about California residents:

- **identifiers**, such as name and government-issued identifier (e.g., Social Security Number);
- **personal information, as defined by Cal. Civ. Code § 1798.80**, such as contact information or financial information;
- **Demographic Information**, such as age, race, national origin, citizenship, marital status, and sex.
- **commercial information**, such as transaction information and purchase history;
- **biometric information**, such as fingerprints;
- **internet or network activity information**, such as browsing history and interactions with our website, applications, advertisements, and emails;
- **geolocation data**, such as device location and Internet Protocol (IP) location;
- **audio, electronic, visual, and similar information**, such as call and video recordings;
- **professional and employment-related information**, such as work history and prior employer;
- **education information**; and
- **inferences Information** drawn from any of the personal information listed above to create a profile about, for example, an individual’s preferences and characteristics.

We collected such personal information from the following sources:

- Directly from California residents or their representatives;
- Service providers, consumer data resellers, and other third parties;
- Public record sources (federal, state, or local government sources);
- Affiliates;
- Website/mobile app activity/social media; and
- Institutions from consumer-directed third parties or institutions representing a consumer/prospect.

We have disclosed some of the above categories of personal information for business purposes to the following third parties:

- Our affiliates and subsidiaries, including Members 1st, LLC;
- Vendors and service providers that provide services to Members 1st such as website hosting, data analysis, payment processing, information technology and related infrastructure, fraud prevention and data security, customer service, and marketing activities;
- Other third parties authorized by our members to access their personal information, such as data aggregators, and those authorized to conduct transactions online and via mobile devices, and to support loan fulfillment services; and
- Government entities as required by laws and regulations.

Use of Personal Information

In the past 12 months, we have used personal information relating to California residents for one or more of the following business purposes:

- Performing services and offering products, including maintaining or servicing accounts, providing member service, and processing transactions;
- Engaging in advertising or marketing activities;
- Preventing, detecting, and responding to security incidents;
- Undertaking activities, including internal research and analysis, to derive consumer insights and to maintain or enhance the quality of our products and services;
- Maintaining the integrity and the functionality of our information technology systems; and
- Complying with legal requirements.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal information described in the California Customer Records categories
- Demographic Information

- Commercial Information
- Internet Activity
- Employment Information

Members 1st does not, in the traditional sense, “sell” your personal information to third parties by gaining monetary value. We do, at times, share personal information in hopes to gain value for our members.

Rights Under the CCPA and CPRA

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

Request that we disclose to you the following information (subject to applicable exemptions) covering the 12 months preceding your request (“request to know”):

- the categories of personal information that we collected about you and the categories of sources from which we collected such 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.
- Request that we delete personal information that we collected from you, subject to applicable exceptions (“request to delete”). As stated above, we do not sell your personal information.
- Be free from unlawful discrimination for exercising your rights under the CCPA or CPRA.

Authorized Agents and Verification

Only you, or a person whom you have properly designated as your agent to act on your behalf, may make a request related to your personal information shared. You may also make a request on the behalf of your minor child in accordance with Members 1st procedures.

All requests must be properly verified. This means that you must present sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. In rare cases we may require you to visit a Members 1st branch or acknowledge your identity.

How to Make Requests

If you are a California resident, you or your authorized agent can use any of the following methods to make a request for the disclosures described above or to request that we delete personal information we collected from you.

- Calling us toll-free at 1-800-237-7288

Responses

We will work to process all verified requests within 45 days. If we need an extension in order to process your request, we will reach out to you.

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 or CPRA's rights.

We will advise you in our response if we are not able to honor your request. 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.

Non-Discrimination

California consumers have the right to exercise their access, deletion, and other rights without discrimination. We will not discriminate against you for exercising your rights. This generally means we will not deny you goods or services, charge different prices or rates, provide a different level of service or quality of goods, or suggest that you might receive a different price or level of quality for goods or service. Please know, if you ask us to delete or stop sharing your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services which require usage of your personal information to function.

Contact for More Information

For any questions or concerns regarding the Members 1st CCPA or CPRA request process, please call us at (800) 237-7288.

Date Last Updated: [4/7/2022]