

FACTS**WHAT DOES Foothill FEDERAL CREDIT UNION; Foothill INVESTMENT SERVICES DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Transaction or loss history and credit history

When you are *no longer* our member, we continue to share your information as described in this notice.

How?

All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Foothill Federal Credit Union; Foothill Investment Services chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Foothill Federal Credit Union; Foothill Investment Services share?	Can you limit this sharing?
For our everyday business purposes-- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes-- to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes-- information about your transactions and experiences	Yes	Yes
For our affiliates' everyday business purposes-- information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call (626)445-0950 or go to foothillcu.org

Who we are

Who is providing this notice?

Foothill Federal Credit Union; Foothill Investment Services

What we do

How does Foothill Federal Credit Union; Foothill Investment Services protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

For more information, visit
<https://www.foothillcu.org/Resources/Information/Security/Privacy-Security-Policies>

How does Foothill Federal Credit Union; Foothill Investment Services collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- use your credit or debit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes - information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include financial companies, such as TruStage Insurance Company to provide life, health, AD&D, auto and home insurance.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Foothill Federal Credit Union; Foothill Investment Services does not share with nonaffiliates so they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partner(s) include TruStage Insurance Company to provide life, health, AD&D, auto and home insurance*

Other important information

Other Privacy Statement

For more information on our Privacy Policy, you may write us at P.O. Box 660130, Arcadia, CA 91066-0130, or call us at 626.445.0950, or email us at cu@foothillcu.org.

IMPORTANT PRIVACY CHOICES FOR CONSUMERS

You have the right to control whether we share some of your personal information.

Please read the following information carefully before you make your choices below.

YOUR RIGHTS

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending you information about some other products or services.

YOUR CHOICES

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies.

NO, please do not share personal and financial information with your affiliated companies.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services to you.

NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

TIME SENSITIVE REPLY

You may make your privacy choices at any time. The choices marked here will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

Name: _____

Account or Policy Number(s): _____ [to be filled in by consumer]

Signature:

Signature:

To exercise your choices do one of the following:

- Fill out, sign and send back this form to us using the envelope provided (you may want to make a copy for your records).
- Call this toll free number: (626)445-0950.

CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY

We are required to provide California residents with a comprehensive description of our online and offline privacy policy and practices regarding the collection, use, sale or sharing, and retention of your personal information (our "Information Practices"); to inform you of your rights regarding your personal information; and to provide you with any information necessary for you to exercise those rights.

Your Rights Regarding Your Personal Information

- (1) **Right to Know.** You have the right to know the personal information that we collect, use, and sell or share about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting and selling or sharing personal information; and the specific pieces of personal information that we have collected about you. Subject to certain exceptions, we will provide you with all of your personal information that we have collected or maintained. This will include any personal information that our service providers or contractors have collected pursuant to their written contract with us.
- (2) **Right to Delete.** You have the right to request us to delete any personal information that we have collected about you. Subject to certain exceptions, we will delete the personal information that we have collected about you from our records, and we will direct any service provider or contractor to delete your personal information from their records.
- (3) **Right to Correct.** You have the right to request us to correct any inaccurate personal information that we maintain about you. Subject to certain exceptions, we will correct the personal information that we maintain about you on our existing system, and we will direct any service provider or contractor that maintain the personal information at issue pursuant to their written contract with us to make the necessary corrections on their systems.
- (4) **Right to Opt-Out.** We sell or share your personal information to third-parties, but you have the right to opt-out of the sale or sharing of your personal information at any time. If you are 16 years or older, you may direct us not to sell or share your personal information to third-parties at any time. If you are at least 13 years old but less than 16 years old, we will not sell or share your personal information unless you consent. If you are younger than 13 years old, we will not sell or share your personal information unless we receive the consent from your parent or guardian.

We will process your opt-out preference signal and you can use the opt out-preference signal according to the following on how we address opt-out preference signals to comply with our obligations to California consumers under the CCPA. The CCPA defines an "opt-out preference signal" as a signal that is sent by a platform, technology or mechanism, on a consumer's behalf, that communicates the consumer's choice to opt-out of the sale and sharing of personal information for cross-context behavioral advertising purposes and that complies with certain technical requirements. Since we do not sell or share your personal information for cross-context behavioral advertising purposes, we do not respond to opt-out preference signals. For purposes of this section, an opt-out preference signal is a signal that is sent by our platform, technology, or mechanism on your behalf that automatically communicates your choice to opt-out of the sale or sharing of your personal information.

- (5) **Right to Not Receive Discriminatory Treatment.** You have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the California Consumer Privacy Act ("CCPA"). A price or service difference is discriminatory and prohibited if we treat you differently because you exercised a right conferred by the CCPA or its issuing regulations. A price or service difference is non-discriminatory if it is reasonably related to the value of your data.

Types of Personal Information

Collected Personal Information

Categories of Personal Information. We collected the following categories of personal information in the preceding 12 months:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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 any other financial information, medical information, or health insurance information.
- Characteristics of protected classifications under California or federal law
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Biometric Information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement

- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-Related Information
- Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

Categories of Sources. We collected your personal information from the following type of people or entities:

- Directly from you. You enter or provide us with information, whether online or by email, phone, or document upload. For example, your contact information that you provide, your application for a loan, or documents you provide to verify your identity.
- From service providers or third-parties that interact with us in connection with the services and products we provide. For example, companies that work with us to market our products to you, credit reporting agencies from which we check your credit in connection with a submitted application, or other vendors that provide data we use in underwriting or in protecting you and our products from fraud and identity theft.
- Directly and indirectly from you based on activity on our website

Business or Commercial Purposes. We collected your personal information for these business or commercial purposes:

- 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
- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services on behalf of the institution, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the institution
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the business with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers
- Undertaking internal research for technological development and demonstration

Sold or Shared Personal Information

Categories of Personal Information. We sold or shared with third-parties the following categories of personal information in the preceding 12 months:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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 any other financial information, medical information, or health insurance information.
- Characteristics of protected classifications under California or federal law
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Biometric Information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-Related Information
- Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

Categories of Third-Parties. For each type of personal information identified above, we sold or shared that type of information to the following third-parties:

Personal Information	Third-Parties
Identifiers	<ul style="list-style-type: none"> • Service providers • Third parties: <ul style="list-style-type: none"> - With our lending partners, we share Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Sensory Data, Professional or Employment Related Information, and Inferences. -With credit reporting agencies we share Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Sensory Data, Professional or Employment Related Information, and Inferences. -With advisors such as lawyers, banks, and insurers, we share Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric Information, Geolocation Data, Sensory Data, Professional or Employment Related Information, and Inferences. -With governmental and regulatory agencies, we share Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Biometric Information, Geolocation Data, Sensory Data, Professional or Employment Related Information, and Inferences. -With data analytics providers, we share Identifiers, Other Personal Information, Protected Characteristics, Commercial Information, Internet or Network Activity, Geolocation Data, Sensory Data, Professional or Employment Related Information, and Inferences.
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual	<ul style="list-style-type: none"> • Same as above
Characteristics of protected classes or groups under state or federal law	<ul style="list-style-type: none"> • Same as above
Commercial information	<ul style="list-style-type: none"> • Same as above
Internet or other electronic network activity information	<ul style="list-style-type: none"> • Same as above
Biometric information	<ul style="list-style-type: none"> • Same as above
Geolocation data	<ul style="list-style-type: none"> • Same as above
Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> • Same as above
Professional or employment-related information	<ul style="list-style-type: none"> • Same as above
Inferences drawn	<ul style="list-style-type: none"> • Same as above

Business or Commercial Purposes. We sold or shared your personal information for these business or commercial purposes:

- 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
- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services on behalf of the institution, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the institution
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the business with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers
- Undertaking internal research for technological development and demonstration

Personal Information Is Not Disclosed. We have not disclosed your personal information to third-parties in the preceding 12 months.

Notices

Notice of Right to Opt-Out of Sale/Sharing. If we sell or share your personal information, we are required to provide you with a Notice of Right to Opt-Out of Sale/Sharing informing you of your right to direct us to stop selling or sharing your personal information and to provide you with the opportunity to exercise this right.

You may opt-out by completing our online form which you can access at <https://www.cognitofirms.com/FoothillCreditUnion1/californiaconsumerprivacyactccpaoptoutform>. You may also submit your request by using any of the following methods:

- Calling us toll-free at: 866-995-FFCU or 626-445-0950

Before we can respond to a Request to Opt-Out submitted by an authorized agent, we need to confirm not only that person or entity's authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please email us at ccpa@foothillcu.org and provide the following information:

1. The consumer's name, email address, and telephone number.
2. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
 - California Secretary of State entity details and a signed authorization (if the agent is a business),
 - written permission from the California resident (if the agent is an individual), or
 - a valid power of attorney
3. To verify your identity, please attach copies of the following to your request email:
 - Valid Government Issued ID (not expired) AND
 - a Utility Bill, Bank Statement, or similar documentation to verify your name and address.

For purposes of this section, under the CCPA, "sale" is defined broadly is not limited to just the payment of money. We do not directly sell your personal information in the conventional sense (i.e., for money). Like many companies, we connect you with other companies that offer services you may be interested in. We may disclose your personal information to third parties that in turn offer you insurance products or services in exchange for monetary or other valuable consideration. Such sharing can qualify as a "sale" under the CCPA. With companies that provide insurance services we share Identifiers and Other Personal Information. We do not knowingly "sell" the personal information for California residents under the age of 16..

How to Submit A Request Regarding Your Personal Information

You can submit to us a verifiable request to know, request to delete, or request to correct your personal information. We will verify that you are the person who we have collected information about by Only 1) you, 2) a person authorized by you to act on your behalf, or 3) an entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a Request to Know or Request to Delete related to your personal information. You may also make a request on behalf of your minor child.

You may only make a Request for Know twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Given the sensitivity of your personal information that we collect and retain, we will need to verify your identity with at least 3 separate pieces of information such as name, address, account number, date of birth, last 4 of your Social Security Number, phone number, etc.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. No later than 10 business days after receiving your request(s), we will confirm that we received your request(s) and provide you with information

on how we will process your request(s). We will respond to your request to know, request to delete, or request to correct no later than 45 calendar days after receiving your request(s). If we cannot verify your identity within this time period, we may deny your request(s) in whole or in part and will inform you that your identity cannot be verified. If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 calendar days. Our response will cover the 12-month period preceding our receipt of your request.

You can submit your request to know, request to delete, and request to correct by calling us toll-free at 866-995-FFCU or 626-445-0950. You can also submit your request(s) by using any of the following methods:

- Visiting our online form at:
<https://www.cognitofrms.com/FoothillCreditUnion1/californiaconsumerprivacyactccpaoptoutform>

Authorized Agents. We may allow an authorized agent to make a request to know, request to delete, or request to correct on your behalf. We may require written proof that you have given the agent permission to submit a request on your behalf, require the agent to verify their identity with us, or require you to confirm with us that you have provided the agent permission to submit the request. If you are an authorized agent, you may make these requests by following these instructions: Before we can respond to a request submitted by an authorized agent, we need to confirm not only that person or entity's authority to act on behalf of a consumer but also the identity of the authorized agent. If you are authorized to submit a request on behalf of a California resident, please email us at ccpa@foothillcu.org and provide the following information:

1. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:

- California Secretary of State entity details and a signed authorization (if the agent is a business),
- written permission from the California resident (if the agent is an individual), or
- a valid power of attorney.

2. To verify your identity, please attach copies of the following to your request email:

- Valid Government Issued ID (not expired) AND
- a Utility Bill, Bank Statement, or similar documentation to verify your name and address

3. You will also be required to verify the identity of the consumer for whom you are submitting the request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Contact Information

For information about our privacy policy and Information Practices, you can contact us by If you have any questions or comments about this policy, the ways in which we collect and use your personal information, your rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

-Privacy Support Phone: (866) 995-FFCU or (626) 445-0950

-Privacy Support email: cu@foothillcu.org

-Website: www.foothillcu.org

-Postal Address: Foothill Credit Union, Attn: Foothill Privacy, P.O. Box 660130, Arcadia, California 91066-0130

We reserve the right to amend the CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY at our discretion and at any time. When we make material changes to the CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY, we will notify you by a notice on our website homepage.

Please note, not all of the rights described in the CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

NOTICE AT COLLECTION

We are required to provide California residents with timely notice, at or before the point of collection, about the categories of personal information to be collected from you, the purposes for which the personal information is collected or used, and whether that information is sold or shared. For example, upon receiving the Notice at Collection, you can use the information in the notice as a tool to choose whether to engage with us, or to direct us not to sell or share your personal information and to limit the use and disclosure of your sensitive personal information, if applicable. We will not collect additional categories of personal information or use personal information collected for additional purposes that are incompatible with the disclosed purpose for which the personal information was collected without providing you prior notice. Our privacy policy can be found at <https://www.foothillcu.org/Resources/Information/Security/Privacy-Security-Policies/California-Consumer-Privacy-Act>.

Categories of Personal Information. The following categories of personal information are to be collected:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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 any other financial information, medical information, or health insurance information.
- Characteristics of protected classifications under California or federal law
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Biometric Information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-Related Information
- Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

We will retain each category of personal information for a period of at least seven years in accordance with federal and state laws for electronic and hardcopy application and settlement information.

Purpose for Collection. The purpose(s) for which the categories of personal information identified above are collected or used include:

1. Performing services for you, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of us or our service providers. This includes: a) to fulfill or meet the reason for which the information is provided; b) to provide you with information, products, or services that you request from us; c) to provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you; and
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standard.
4. Debugging to identify and repair errors that impair existing intended functionality.
5. To improve our website and present its contents to you.
6. For testing, research, analysis and product development.
7. As necessary or appropriate to protect the rights, property or safety of you, us or others.
8. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
9. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
10. For marketing purposes, including with third parties.
11. To comply with our legal or regulatory obligations.
12. Otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Sold or Shared Categories of Personal Information. For each category of personal information identified above, the following categories have or have not been sold or shared:

Category of Personal Information	Is This Category Sold or Shared?
Identifiers	Yes
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual	Yes
Characteristics of protected classes or groups under state or federal law	No
Commercial information	No
Biometric information	No
Internet or other electronic network activity information	No
Geolocation data	No
Audio, electronic, visual, thermal, olfactory, or similar information	No
Professional or employment-related information	No
Inferences drawn	No

Our Notice of Right to Opt-Out of Sale/Sharing can be found at <https://www.foothillcu.org/Resources/Information/Security/Privacy-Security-Policies/California-Consumer-Privacy-Act>.