



Sunward Federal Credit Union's California Consumer Privacy Act Notice

This notice supplements Sunward Federal Credit Union's Privacy Policy, Privacy Notice, and Cookie Policy (all available at www.GoSunward.org/PrivacyPolicy) by providing California consumers ("consumer", "consumers", "you", "your") with information about rights under the California Consumer Privacy Act ("CCPA"). Sunward Federal Credit Union ("Sunward", "we", "us", "our") respects consumers' privacy and is committed to protecting it. In addition to disclosing your rights under the CCPA, this notice explains how and why we collect, use, disclose, and share data about you based on your use of our products and services, including your membership with Sunward your visits to and/or use of our website, and related online activity. Please read the following carefully to understand our practices regarding your personal data.

California Consumers' Rights under the CCPA

- **Right to Notice**
 - As of January 1, 2020, you shall be informed, before or at the point of collection, about the personal information that is being collected.
- **Right to Know**
 - You have the right to request disclosure of the kinds of personal information that have been collected, used, disclosed, and sold. You have the right to request this information up to twice in a 12-month period at no charge and to receive the information in a form that is readily accessible.
- **Right to Opt-Out**
 - You have the right to opt-out of the sale of your personal information to third-parties with whom we do business. However, Sunward may share personal information as necessary to comply with federal law and for our ordinary business purposes.
- **Right to Request Deletion**
 - You may request the deletion of certain personal information. However, Sunward may not comply with the request for deletion if the personal information is maintained for lawful reasons, such as providing a good or service you requested or complying with obligations under federal, state, or local law.
- **Right to Non-Discrimination**
 - We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:
 - Deny you products or services;
 - Charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties;
 - Provide you a different level or quality of products or services; or
 - Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information"). Here are specific categories of personal information we may collect, depending on which Sunward products and services you access or use.

Category	Examples of the Kinds of Information We May Collect, Depending on the Sunward Products and Services Accessed or Used
Identifiers	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.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80)	A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, or veteran or military status.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Biometric information	Genetic, physiological, behavioral, and/or biological characteristics or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, handprints, faceprints, and voiceprints.
Internet or other electronic network activity	Internet activity such as browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement.

Category	Examples of the Kinds of Information We May Collect, Depending on the Sunward Products and Services Accessed or Used
Geolocation data	Physical location or movements based on internet activity or website interaction.
Sensory data	Audio, electronic, visual, thermal, or similar information.
Professional or employment-related information	Current or past job history.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. §1232g, 34 C.F.R. Part 99))	Education 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.
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Categories of Sources of Personal Information Collected

We obtain the personal information listed above from the following categories of sources:

- Directly from consumers when they conduct business with Sunward. For example, consumers provide documents and other information to us when applying for membership and other services and products;
- Indirectly from consumers. For example, we collect information from our members in the course of providing the services they have requested, such as debit cards;
- Directly and indirectly from activity on our website (www.GoSunward.org) and related online activity. For example, website usage details are collected automatically, as further detailed in our Cookie Policy at www.GoSunward.org/PrivacyPolicy; and
- From third-parties that interact with us in connection with the products and services we provide, as well as interactions related to obligations required by law. For example, we receive information from consumer reporting agencies, government agencies, and other service providers.

Use of Personal Information for Our Business Purposes

We use the personal information we collect for one or more of the following business purposes:

- To fulfill and provide you the service(s) and/or product(s) for which the personal information was collected;
- To send you technical notices, updates, security alerts, and support and administrative messages (such as changes to our terms, conditions, and policies) and to respond to your comments, questions, and customer service requests;
- To distribute voluntary polls and surveys;
- To communicate with you about products, services, and events offered by Sunward and others, as well as provide news and information we think will be of interest to you;
- To monitor and analyze trends, usage, and activities in connection with our products and services;
- To audit the quality and efficacy of our work;
- To develop new products and services and enhance existing products and services;
- To detect, investigate, and prevent potentially fraudulent transactions and other illegal activities, and protect the rights and property of Sunward and our members; and
- To carry out any other purpose described to you at the time the information was collected.

Categories of Third Parties with Whom Personal Information Is Shared

We share your personal information as follows or as otherwise described in this notice:

- With third parties that host, maintain, manage, or provide other services to us in relation to our products and services;
- With third parties that provide financial products and services to our members;
- To cooperate with public and government authorities and law enforcement, to respond to a lawful request, or to provide information we believe is important; and
- For other legal reasons, such as to monitor compliance with and enforce our terms and conditions, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, to protect against potential or actual fraud, money laundering, terrorism, or other illegal activity, and for risk management purposes.

We may also share aggregated or de-identified information that cannot reasonably be used to identify you.

Categories of Personal Information Shared for Business Purpose

To effectuate our business purposes, Sunward shares all of the categories of personal information identified in the table further above. Those categories are:

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80);
- Protected classification characteristics under California or federal law;
- Commercial information;
- Biometric information;
- Internet or other electronic network activity;
- Geolocation data;
- Sensory data;
- Professional or employment-related information;

- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. §1232g, 34 C.F.R. Part 99)); and
- Inferences drawn from other personal information.

Categories of Personal Information Sold

In special circumstances, Sunward shares the following categories of personal information to allow a trusted partner to offer additional financial products or services to our members:

- Identifiers (like name and postal address);
- Personal information categories listed in the California Customer Records statute (like a telephone number);
- Protected classification characteristics under California or federal law (like age and gender); and
- Commercial information (like whether you have a checking account).

Exercising Your CCPA Rights

You may exercise your right to know, right to opt-out, and/or right to delete at any time by submitting your name, account number, and request to Sunward as follows:

1. Complete and submit the request located on our website at www.GoSunward.org/CAPrivacyRequest;
2. Call us toll-free at 800.947.5328, or at 505.293.0500; or
3. Come into one of our branches to have one of our friendly staff members assist you in submitting your request.

Please also see the “User-Enabled Privacy Controls Related to Advertising and Online Analytics” section further below for information about opting out of tracking of internet activity.

Your opt-out and deletion choice(s) will remain in place unless you state otherwise. However, the CCPA does not prohibit the sharing of information necessary for us to follow the law or for our ordinary business purposes. This includes sending you information about our products and services.

Request Response Timing and Format

Sunward endeavors to verify and respond to each verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you are enrolled in eStatements and eNotices, the requested information will be sent to the email address we have on file for you. If you are not enrolled in eStatements and eNotices, the requested information will be sent to your mailing address on file. Any response we provide will only cover the 12-month period preceding the verifiable consumer request. If applicable, the response will also explain the reasons we cannot comply with a request.

User-Enabled Privacy Controls Related to Advertising and Online Analytics

Sunward’s website uses Google Analytics to collect information about how visitors use the website. Sunward uses Remarketing and Google Ads as part of Google Analytics. Remarketing allows us to give you direct relevant advertising on third-party websites if you have visited the Sunward website. Google Ads allow us to gather information about your visit to our website for our own advertising use. Google Analytics uses cookies to collect information in an anon-ymous form. (“Cookies” are files that store information through a web browser on your computer and that allow a particular website to recognize that you have visited before.) If you wish to opt out of being tracked by Google Analytics across all websites, please visit <http://tools.google.com/dlpage/gaoptout>. Please also see Sunward’s Cookie Policy at www.GoSunward.org/PrivacyPolicy.

Children

Most of our services are not designed for children. Unless a parent or guardian chooses to open a primary or custodial account for a minor, we will not knowingly collect the personal information of a minor. If you have reason to believe that a child has provided personal data to us without the consent of a parent or guardian, please contact us and we will endeavor to delete that information from our databases. We do not sell the personal information of minors under 16 years of age.

Links to Other Websites

Our website (www.GoSunward.org) may contain links to other websites. Please note that Sunward is not responsible for the privacy or information security practices of other websites. You should carefully review the applicable privacy and information security policies and notices for any other websites you visit via our website.

Changes to This Notice

From time to time, we may revise this notice. Changes may be made for any number of reasons, including to reflect industry initiatives, changes in the law, and changes to the scope of our products and services, among other reasons. This notice was last updated in December 2019.

Contact Us

To submit a request, please visit our website at www.GoSunward.org/CAPrivacyRequest. If you have any other questions concerning this notice, please contact us by phone at 505.293.0500 or toll free at 800.947.5328, send a secure message through online banking, or email us at ebranch@GoSunward.org.



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