#### FOR CALIFORNIA RESIDENTS:

This CCPA Privacy Notice for California Residents supplements iQ Credit Union's Privacy Policy. iQ Credit Union has adopted this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and its implementing regulations (to the extent that the laws and regulations are applicable to iQ Credit Union).

Most of the information that iQ Credit Union collects is subject to the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, and regulations promulgated by the National Credit Union Administration and the Consumer Financial Protection Bureau. This means that most of the information we collect is not subject to the CCPA.

# Information We Collect

iQ Credit Union collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (considered personal information). While most of this information collected is exempt from the CCPA, it is important for to be transparent about the information we do collect.

Category	Examples
A. Identifiers.	Names, addresses, 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.
B. Protected classification characteristics under California or federal law.	Age (40 years or older), 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.
C. Commercial information.	Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.
D. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
E. Geolocation data.	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
F. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

#### Personal information *does not* include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
  - 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;
  - personal information covered by certain sector-specific privacy laws, including the FCRA, GLBA or California Financial Information Privacy Act ("FIPA"), and the Driver's Privacy Protection Act of 1994.

IQ obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website and mobile apps.
- Credit reporting agencies
- Other third parties you may consent to during a loan application such as employers, references, and landlords.

# **Sharing Personal Information**

iQ may disclose your personal information to a third party for business purposes, to perform services for us, or to function on our behalf. When we disclose personal information for a business purpose, we do so with a contract in place that describes the nature of the relationship and requires the recipient of such information to maintain confidentiality for personally identifiable information as well as not using the information for any purposes other than what is defined in the contract.

We share your personal information with the following categories of third parties:

Service providers.

### Sales of Personal Information

iQ Credit Union does not sell personal information.

### Disclosures of Personal Information for a Business Purpose

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

Category A: Identifiers.

Category B: Protected classification characteristics under California or federal law.

Category C: Commercial information.

Category D: Internet or other similar network activity.

Category E: Geolocation data.

Category F: Inferences drawn from other personal information.

# **Your Rights and Choices**

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

## Access to Specific Information and Data Portability Rights

You have the right to request that iQ Credit Union disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### **Deletion Request Rights**

Subject to certain exceptions, you have the right to request that iQ delete any of your personal information that we collected from you and retained. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 1. 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 on our contract with you.
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- 3. Debug products to identify and repair errors that impair existing intended functionality.
- 4. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 5. Comply with a legal obligation, such as contracts and regulatory requirements.
- 6. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by <u>clicking here</u>.

Only you or someone legally authorized to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

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.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer 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.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

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

## Appointing an Authorized Agent

Because iQ collects information and provides services in its ordinary course of business as a financial institution, the credit union only accept an agent to act on your behalf designated via a power of attorney or limited power of attorney that meets the requirements of Washington State Law or the state the power of attorney was signed in.

### Response Timing and Format

We will make every attempt to respond to a verifiable consumer request within forty-five (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 have an account with us, we will deliver our written response to the email or physical address

associated with that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hinderance.

We do not charge a fee to process or respond to your verifiable consumer request.

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

# **Questions or for More Information**

If you have any questions or comments about this notice, the ways in which iQ collects and uses your information described in this notice and in the <u>Privacy Policy</u>, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us through any of the methods listed in Contact Information above.