



CALIFORNIA CONSUMER PRIVACY POLICY

What are Your Rights?

The California Consumer Privacy Act (CCPA) establishes rules for how companies manage and share the personal data of California residents. CCPA applies to any consumer which the Act defines as a natural person who is a California resident. As used in this policy, and as defined in the CCPA, “share” means communicating a consumer's personal information to a third party for cross-context behavioral advertising.

CCPA provides Californians the right to:

- Know what personal information is being collected about them along with the sources from which it is collected, the business purpose for collecting the information and how that data is used.
- Know whether their personal information is sold, shared, or disclosed, the business purpose for doing so and to whom.
- Be able to access their personal information maintained by any company or non-profit organization.
- Request to have their personal information deleted (subject to some exceptions).
- Request to have their personal information corrected if found to be inaccurate.
- Opt-out of the sale or sharing of all of their personal information.
- Limit the use and disclosure of their sensitive personal information to permitted business purposes, such as that which is necessary to perform or provide the goods and services requested by the consumer.
- Be free from unlawful discrimination because of exercising their rights under CCPA.

Exceptions

The CCPA, and therefore this Policy, do not apply to the following:

- The consumer is not a California resident.
- Personal Information that has been collected from California residents who apply for or obtain our financial products and services for personal, family, or household purposes as this information is subject to the Gramm-Leach-Bliley Act (GLBA), Fair Credit Reporting Act (FCRA), or California Financial Information Privacy Act (FIPA).
- Personal information that has been aggregated so it relates to a group or category of consumers, the consumer identities have been removed, and the information is not linked or reasonably able to be linked to any consumer or household.
- Personal information that has been deidentified meaning it cannot reasonably identify, relate to, describe, be associated with, or directly or indirectly linked to the consumer, and technical safeguards and business practices have been implemented that prohibit reidentification of the information and ensure no attempts are made to reidentify the information.

Right to request “right to know” specific information and data portability rights:

If none of the exceptions to your rights are applicable and you have not made this request more than twice in a 12-month period, you may request that we disclose certain information to you about the personal information we collected and how we used it over the past 12 months. You may also request this information beyond the 12-month period for personal information collected on or after January 1, 2022.

Right to request that personal information be deleted:

You have the right to request that we delete any of your personal information or sensitive personal information that we have collected and retained unless it is still needed for business purposes or for legal or compliance purposes.

Right to correct inaccurate personal information:

You have the right to request that we correct any inaccurate personal information or sensitive personal information that we maintain.

How Do You Make a Request?

Consumers or persons they authorize to act on their behalf may submit a verifiable request by:

1. Calling **(800) 564-1588**.
2. Mailing a request to:
CommonWealth Central Credit Union
P.O. Box 641690
San Jose, CA 95164-1690
3. Emailing a request to service@wealthcu.org.
4. Submitting a request online at <https://www.wealthcu.org/privacy>.
5. Submitting a request in person at one of our branches.

You may have an authorized agent submit your request on your behalf to CommonWealth Central Credit Union by providing the agent written authorization which must be provided to the Credit Union along with the request.

Upon submission of your request for your personal information, we will take steps to verify your identity, and if applicable, that of your authorized agent. Those steps may vary depending on your relationship with CommonWealth Central Credit Union. The credit union will ask you to provide personal identifying information as well as specific information regarding products and services obtained from the credit union.

We will confirm receipt of your request within 10 business days and work to process all verified requests within 45 calendar days of receipt of your request. If we need an extension (time not to exceed a total of 90 calendar days from the receipt of your request) in order to process your request, we will send you a notification with an explanation of the reason that we require more than 45 calendar days to respond to your request and time frame within which the response can be expected.

Why Do We Collect Personal Information?

We collect and use your personal information for our everyday business purposes including:

- Open an account
- Verify your identity
- Process your transactions
- Maintain your account(s)
- Process loan applications and other requests for products or services

What Categories of Personal Information Do We Collect?

The personal information we collect depends on the product or service you have with us. The categories of personal information and sensitive personal information the Credit Union has collected from consumers in the last 12 months include:

- Identifiers:
 - Names
 - Postal addresses
 - Social security numbers
 - Telephone numbers (home phone or mobile phone)
 - Account numbers
 - Driver's license numbers or state identification card numbers
 - Email addresses
 - Passport numbers
- Professional or employment-related information:
 - Current or past job history
- Income
- Credit history and credit scores
- Checking account information and account transactions
- Electronic consumer data collected from our website:
 - Geolocations
 - IP addresses
 - Device identifiers
 - Browsing history

What Sources are Used to Collect Personal Information?

CommonWealth Central Credit Union obtains personal information from the following sources:

- You or your authorized agent.
- Our website and the applications you access.
- Third party service providers in connection with providing our services or for everyday business purposes such as:
 - A credit report obtained from a credit bureau to evaluate a loan application.

- Information to help us detect security incidents and fraudulent activity.

Why is Personal Information Collected or Disclosed?

CommonWealth Central Credit Union collects your personal information for one or more of the following business purposes:

- Provide you with information, products, or services you request from us.
- Carry out obligations and enforce our rights arising from any contracts entered into between you and the Credit Union such as billing and collections.
- Respond to law enforcement requests as required by applicable law, court order, or governmental obligations

We may share your sensitive personal identifiable information with:

- Our third party service providers and payment to facilitate your services or transactions, or;
- Other financial companies with whom we have a joint marketing agreement that protects your sensitive personal information.

You have the right to opt-out of the sharing of your personal information by CommonWealth Central Credit Union with third parties, except our sharing with our third party service providers and payment transaction processors.

We disclose personal information for our everyday business purposes as permitted or required by law such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus. The Credit Union does not use or disclose sensitive personal information for purposes other than as permitted or required by law.

What Personal Information Is Disclosed for Business Purpose and With Whom?

Category	Examples	Category of Third Parties
Identifiers	A real name or alias; postal address; signature; home phone number or mobile phone number; membership number, credit card number, debit card number, or other financial information; physical characteristics or description; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.	Our service providers and third parties.
Personal information categories listed in the California Customer Records	A 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. Some personal information included in this category may overlap with other categories.	Our service providers and third parties.

Protected Classification Characteristics under State 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, genetic information (including familial genetic information).	Our service providers and third parties.
Sensitive Information	Is not publicly available and includes personal identifications, such as social security number, driver's license, or passport number; a consumer's login, financial account, debit card, or credit card number in combination with a security or access code; protected classifications or characteristics protected under state or federal law such as, 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, genetic information (including familial genetic information).	Our service providers and third parties.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Our service providers and third parties, courts, law enforcement, credit bureaus.
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Our service providers and third parties.
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.	Our service providers and third parties.
Biometric information	Fingerprints, photographs, facial or voice recognition.	N/A
Professional or employment-related information	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.	N/A
Non-public education information	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.	N/A

Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities, and aptitudes.	Our service providers and third parties.
Employment Related Information	Personal information that is collected by the business about a natural person within the context of the natural person's role or former role as a job applicant to, an employee of, or independent contractor of, that business, or as an emergency contact to those persons. The collection of employment-related information, including for the purpose of administering employment benefits, shall be considered Business Purpose.	Our service providers and third parties.

How Long is Personal Information Retained?

We do not retain personal information or sensitive personal information longer than is needed for the business purpose for which it was collected and as otherwise required by law.

CommonWealth Central Credit Union does not Sell or Share Personal Information.

Consumers Under 16 Years of Age

CommonWealth Central Credit Union collects, uses, and discloses the personal information and sensitive personal information of consumers under the age of 16 in the same manner, from the same sources, and for the same purposes as the personal information and sensitive personal information collected from consumers 16 years of age and older as described previously in this California Consumer Privacy Policy. However, to its knowledge, the Credit Union does not share personal information of consumers under the age of 16.

Questions?

If you have questions or concerns regarding CommonWealth Central Credit Union's privacy policies or practices, contact us by calling **(800) 564-1588**.