



# California Privacy Policy and Notice

Updated on: July 1, 2023

This California Privacy Policy and Notice (the “**policy**”) is designed to help California residents (“**consumers**” or “**you**”) understand how Pentagon Federal Credit Union (“**PenFed**”, “**we**”, “**us**” or “**our**”) processes the information we collect when you use our website located at [www.penfed.org](http://www.penfed.org) and each of its associated domains (together, the “**Sites**”), our mobile applications (the “**Apps**,”), and when you communicate with us, including offline or in-person (collectively, the “**Services**”).

We have created this policy to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”), as amended by the California Privacy Rights Act (“**CPRA**”) effective January 1, 2023. This policy supplements the information contained in Pentagon Federal Credit Union’s Privacy Policy located at [www.penfed.org/privacy-policy](http://www.penfed.org/privacy-policy).

**As a financial institution, PenFed largely collects, uses, and transfers Personal Information that is regulated by a federal law called the Gramm-Leach-Bliley Act (“GLBA”). The Personal Information that we collect under the GLBA is exempt from the CCPA. As such, this policy and the rights described herein do not apply to any Personal Information we collect under the GLBA. For example, this policy 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.**

### Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with particular consumers or households (“**Personal Information**”). In particular, we may have collected the following categories of Personal Information from our consumers within the last twelve (12) months:

Category	Examples	Collected
<b>A.</b> Identifiers.	Internet Protocol address or email address.	YES
<b>B.</b> Protected classification characteristics under California or federal law.	Veteran or military status.	YES
<b>C.</b> Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES.
<b>D.</b> Internet or other electronic network activity information.	Information regarding your interaction with our website and/or advertisements	YES.



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<b>E.</b> Professional or employment-related information.	Current or past job history.	YES
<b>F.</b> Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, and aptitudes.	YES.

We also collect the following categories Personal Information that are exempt from the CCPA and therefore, this policy and the rights described herein do not apply:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, including but not limited to:
  - 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 as any such information pertains to PenFed employees; and
  - Personal Information covered by certain sector-specific privacy laws, including the GLBA, the Fair Credit Reporting Act (“FCRA”), or California Financial Information Privacy Act (“CFIPA”), and the Driver’s Privacy Protection Act of 1994.

PenFed obtains each of the categories of Personal Information listed above from the following categories of sources:

- directly from you. For example, from forms you complete or information you provide to obtain products and services from us;
- indirectly from you. For example, we collect your Personal Information from observing your actions on the Sites or Apps; and
- from a third party. For example, we collect your Personal Information from international sanctions lists, third-party websites, government authorities, consumer reporting agencies, affiliates, our members, other companies, or business partners for our everyday business purposes.

### **Use of Personal Information**

We may use each category of Personal Information we collect for one or more of the following business purposes:

- providing you with products and/or services that you have requested and communicating with you about those products and services;
- developing and improving our Services and your experience;



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- personalizing your Site experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites, and via email or text message;
- tailoring products and services, provide more consistent and accurate information, provide you with information more efficiently, perform our contract with you, and serve other business purposes;
- processing and dealing with any complaints or inquiries made by you or legally on your behalf;
- monitoring and analyzing the use of our products and services for risk assessment and control purposes (including detection, prevention, and investigation of fraud);
- conducting crime prevention and compliance activities such as audit and reporting, maintenance of accounting and tax records, fraud prevention and anti-money laundering (AML) efforts, and measures relating to sanctions, antiterrorism laws and regulations and fighting crime;
- creating, maintaining, customizing, and securing your account with us;
- maintaining the safety, security, and integrity of our Sites and Services, databases, and business;
- protecting the health and safety of our personnel, customers, and the general public;
- testing, research, analysis, and product development, including to develop and improve our Sites and Services;
- engaging in advertising or marketing activities;
- evaluating or conducting a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer or some or all of a company's assets; and
- for other purposes that may be described to you when collecting your Personal Information.

Cross-context behavioral advertising is the targeting of advertising by a business to consumers based on Personal Information obtained from consumers' interactions with third-party websites, applications, or other services. PenFed engages in cross-context behavioral advertising through the use of cookies; see "The Right to Opt-Out" section for more information on how you can control your privacy in this context.

### **Disclosing Personal Information**

PenFed may disclose or share your Personal Information to a third party for a business purpose or other purpose with your consent, as noted in our privacy policies available at [www.penfed.org/privacy-policy](http://www.penfed.org/privacy-policy).

We may disclose or share your Personal Information with the following categories of third parties:

- Service providers;
- Affiliates;
- Marketing partners; and/or
- Government Authorities.



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In the preceding twelve (12) months, PenFed may have disclosed or shared the following categories of Personal Information to those third parties that require information:

- Identifiers;
- Protected classification characteristics under federal law;
- Internet or other similar network activity;
- Professional or employment-related information; and/or
- Inferences drawn from other Personal Information.

PenFed does not sell your Personal Information to third parties for monetary or other consideration.

### **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.

#### ***The Right to Know & to Access Personal Information (hereinafter, the “Right to Know”)***

Subject to our receipt and confirmation of your verifiable consumer request, you have the right to request that PenFed disclose certain information to you about our collection and use of your Personal Information over the past 12 months, which may include the following:

- the categories or specific pieces 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 to whom we disclose that Personal Information;
- if we shared or disclosed your Personal Information to third parties, information concerning:
  - the categories of Personal Information that we collected about you;
  - the categories of Personal Information that we shared about you and the categories of third parties to whom we shared your Personal Information, by category or categories of Personal Information for each category of third parties to whom we shared such Personal Information;
  - the categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom we shared such Personal Information for a business purpose.

#### ***The Right to Delete***

Subject to certain exceptions, you have the right to request that PenFed delete your Personal Information that we collected from you and retained. Once we receive and confirm your verifiable consumer request for information pursuant to our verification process for such requests, we will delete (and notify our service providers or contractors to delete) your Personal Information from our records unless an exception applies. We will also notify all third parties to whom we have disclosed such Personal Information to delete your information unless such action proves



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impossible or involves disproportionate effort. Please note that we may be required by law or regulation to maintain copies of Personal Information.

### *The Right to Correct Inaccurate Personal Information*

If you find that the Personal Information about you retained by PenFed is inaccurate, you have the right to request that we correct it, subject to the nature of that Personal Information and the purposes for its processing. Once we receive and confirm your verifiable consumer request to correct inaccurate Personal Information pursuant to our verification process for such requests, we will use commercially reasonable efforts to correct the inaccurate information as directed by you.

### *Exercising Your Rights to Know, to Delete, and to Correct Inaccurate Personal Information*

To exercise your Right to Know, Right to Delete, or Right to Correct Inaccurate Personal Information described above, please submit a request to us by either calling us at **1-800-247-5626** or emailing us at **privacy@penfed.org**.

You may only make a Right to Know, Right to Delete, or Right to Correct Inaccurate Personal Information request 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; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will take steps to verify you and, if applicable, your agent's identity before processing your Right to Know, Right to Delete, or Right to Correct Inaccurate Personal Information request, which may include asking you to answer questions about your account and relationship with us.

Only you or an authorized representative may make a verifiable consumer request related to your Personal Information. We cannot honor your request if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

### *Response Timing and Format*

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and the length of the extension in writing.

### *The Right to Opt-Out*

It is PenFed's policy not to sell Personal Information, and we have not done so in the past 12 months. As PenFed does not sell your Personal Information, we do not offer an opt-out for that purpose under the CCPA. To opt-out of sharing of your Personal Information, please visit [www.penfed.org/optout](http://www.penfed.org/optout).



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### Non-Discrimination

Please note that without the use of certain Personal Information, we may not be able to provide (or continue providing) relevant products or services or otherwise do business with you. However, we will not discriminate against you for exercising any of your CCPA rights or deny you goods or services except as permitted by the CCPA or other applicable law.

### Authorized Agents

You also have the right to use an authorized agent to make a request under the CCPA on your behalf. California residents who have a relationship with PenFed may rely on a valid general power of attorney already on file that appoints the Authorized Agent as Attorney-in-Fact. California residents who do not have a valid general power of attorney already on file, or do not have a relationship with PenFed, must designate their authorized agent using the limited CCPA Power of Attorney (“POA”) Form.

Parents/legal guardians making requests on behalf of their minor children will need to complete the Parent/Legal Guardian Cover Sheet and include a certified copy of the birth certificate or legal document to provide proof of their status.

The CCPA POA Form and Parent/Legal Guardian Cover Sheet can be found at <https://www.penfed.org/forms>.

Completed limited CCPA POA Forms and Parent/Legal Guardian Cover Sheets may either be:

- mailed to P.O. Box 247009, Omaha, NE 68124-7009; or
- dropped off at a PenFed branch located in California.

### Changes to Our Policy

PenFed reserves the right to amend this policy at our discretion at any time. When we make changes to this policy, we will post the updated policy on the Services and update the policy’s effective date. Your continued use of our Services following the posting of changes constitutes your acceptance of such changes.

### Contact Information

If you have questions or concerns about our treatment of your Personal Information or about our privacy practices in general, please contact us at [privacy@penfed.org](mailto:privacy@penfed.org) or toll-free at **1-800-247-5626**.