



Altura Credit Union Online Privacy Policy

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1. Overview

This Online Privacy Policy (the “Online Privacy Policy”) summarizes the online privacy practices of Altura Credit Union and its subsidiary, Auto Expert (collectively, the “Credit Union”), with respect to its websites, online and mobile banking applications, and social media pages (collectively, the “Websites”) that can be accessed on computers, tablets, mobile phones, and other devices. By accessing any of our Websites, you acknowledge and consent to the practices set forth in the Credit Union’s Online Privacy Policy.

Your privacy is important to us, and the purpose of this Online Privacy Policy is to explain how we collect, use, share, and safeguard information when you visit our Websites.

2. Information We May Collect

When visiting our Websites, you may be asked to provide your personal information in order to apply for one of our products/services, or access our online/mobile banking applications. The information that you provide may include your name, email address, physical address, phone number, tax identification number, date of birth, and other unique identifiers.

3. Protecting Your Information

The Credit Union respects your right to privacy and recognizes the importance of protecting your personal information. To that end, we maintain administrative, technical, and physical safeguards which comply with applicable federal and state laws that govern the privacy and security of such information.

4. Sharing Your Information

The Credit Union may share your information with third parties, as permitted by applicable federal and state laws; for example, your information may be shared with third parties, such as vendors, for the purpose of responding to legal notices or administering/servicing your account. Otherwise, the Credit Union will not disclose your personally identifiable information or make available any personal information about your online activities in connection with your use of our Websites. For more information on how we may share information with affiliates and third parties, please see the additional privacy notices "California Privacy Choices for Consumers," "Federal Privacy Policy and Opt-Out Notice," and "Affiliate Marketing Opt-Out Notice," which are accessible at <https://www.alturacu.com/disclosures>.

5. Cookies and "Do Not Track"

A cookie is a small piece of information that a website stores on your web browser and can later retrieve. The cookie can be read by the website that "set" the cookie and cannot be read by any other website. We use cookies to manage online banking sessions and in areas where you are able to customize the information you see. The use of these cookies is designed to make your online experience easier and more personal. You may customize your browser to inform you when cookies are set, prevent cookies from being set, or enable your web browser's "Do Not Track" signal. We may not separately respond to or take any action with respect to a "Do Not Track" configuration set in your web browser.

6. Third Party Links

The Credit Union may include or offer third party products or services on its Websites. The websites of these third parties have separate and independent privacy policies. While we undertake every effort to keep your information secure, the Credit Union exercises no control over these third party websites, so we therefore bear no responsibility or liability for their external content and activities.

7. California Online Privacy Protection Act – Statement of Compliance

Pursuant to the California Online Privacy Protection Act, we offer several ways to review and update your information. Online users may log onto our banking platform and select the "My Settings" tab. You may also review and update your information by calling 888-883-7228, writing to P.O. Box 908, Riverside, CA, 92502, or visiting your local Credit Union branch.

8. Children's Online Privacy Protection Act – Statement of Compliance

We do not knowingly collect personally identifiable information from individuals under the age of 13 through our Websites or mobile banking application without obtaining verifiable consent from their parents. Additional information about the Children's Online Privacy Protection Act is available at the Federal Trade Commission's website: www.ftc.gov.

9. California Consumer Privacy Act – Statement of Compliance

- A. Description of Your Rights:** The California Consumer Privacy Act ("CCPA") confers statutory rights that provide California consumers with greater control and transparency over the use of their personal information by affected companies operating within this state. These statutory rights, include, among other things, the protections listed below. You may submit verifiable consumer requests, obtain additional information about these protections, and direct any questions to the Credit Union via telephone (888-883-7228) or by email (ccparequest@alturacu.com).

- ***Right to Request and Receive Personal Information Disclosures under CCPA (California Civil Code § 1798.100)***

Under CCPA, you have the right to request that a business that collects your personal information disclose the categories and specific pieces of personal information the business has collected about you. A business that collects your personal information must, at or before the point of collection, inform you about the categories of personal information to be collected and the purposes for which the categories of personal information shall be used. A business must not collect additional categories of personal information or use personal information collected for additional purposes without providing you with this notice. In order to receive this information, you must provide the Credit Union with a verifiable consumer request. Upon receiving a request, the Credit Union will promptly take steps to disclose and deliver, free of charge to you, the personal information required by this CCPA provision. The information will be delivered by mail. Under CCPA, businesses are not required to respond to requests more than twice in a 12-month period. In addition, CCPA does not require businesses to retain any personal information collected for a single, one-time transaction, if such information is not sold or retained by the business or to reidentify or otherwise link information that is not maintained in a manner that would be considered personal information.

- ***Right to Request Deletion of Personal Information under CCPA (California Civil Code § 1798.105)***

Under CCPA, you have the right to request the deletion of personal information that a business has collected from you. A business that collects personal information about consumers must disclose, pursuant to California Civil Code § 1798.130, the rights of consumers to request the deletion of their personal information. Accordingly, a business that receives a verifiable consumer request for deletion must delete your personal information from its records and direct any service providers to delete your personal information from their records. Certain exceptions apply to these requests. A business or a service provider is not required to comply with your request to delete your personal information if it is necessary for the business or service provider to maintain your personal information in order to: (1) complete the transaction for which the personal information was collected, provide a good or service that you requested, or reasonably anticipated within the context of a business's ongoing business relationship with you, or otherwise perform a contract between the business and you; (2) detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; (3) debug to identify and repair errors that impair existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; (5) comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the California Penal Code; (6) engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent; (7) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the business; (8) comply with a legal obligation; or (9) otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

- ***Right to Receive Disclosures about the Collection of Your Personal Information (California Civil Code § 1798.110)***

Under CCPA, you have the right to request that a business that collects your personal information disclose the following information: (1) the categories of personal information it has collected about you; (2) the categories of sources from which the personal information is collected; (3) the business or commercial

purpose for collecting or selling personal information; (4) the categories of third parties with whom the business shares personal information; and (5) the specific pieces of personal information it has collected about you. A business that collects your personal information must disclose, pursuant to paragraph (3) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer request. A business that collects your personal information must disclose, pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130 the information cited above. However, a business is not required to retain any personal information about a consumer collected for a single one-time transaction if, in the ordinary course of business, that information about the consumer is not retained, or re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information.

- ***Right to Receive Disclosures about the Sale and Disclosure (for a Business Purpose) of Your Personal Information (California Civil Code § 1798.115)***

Under CCPA, you have the right to request that a business that sells your personal information, or that discloses it for a business purpose, disclose to you: (1) the categories of personal information that the business collected about you; (2) the categories of personal information that the business sold about you and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each category of third parties to whom the personal information was sold; and (3) the categories of personal information that the business disclosed about you for a business purpose. A business that sells your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to paragraph (4) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer request. A business that sells your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to subparagraph (C) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130: (1) the category or categories of consumers' personal information it has sold, or if the business has not sold consumers' personal information, it must disclose that fact; and (2) the category or categories of consumers' personal information it has disclosed for a business purpose, or if the business has not disclosed the consumers' personal information for a business purpose, it must disclose that fact. Under CCPA, a third party is prohibited from selling personal information about a consumer that has been sold to the third party by a business unless the consumer has received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to California Civil Code § 1798.120. **Please note that the Credit Union does not sell your personal information.**

- ***Right of Nondiscrimination for Any Exercise of Your Rights under CCPA (California Civil Code § 1798.125)***

Under CCPA, a business must not discriminate against you because you exercised any of your rights under the CCPA; these prohibited discriminatory acts include, and are not limited to: (1) denying goods or services to you; (2) charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (3) providing a different level or quality of goods or services to you; and (4) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services. CCPA does not prohibit a business from charging a consumer a different price or rate, or from providing a different level or quality of goods or services to the consumer, if that difference is reasonably related to the value provided to the business by the consumer's data. In addition, a business may offer financial incentives, including payments to consumers as compensation, for the collection of personal information, the sale of personal information, or the deletion of personal information. A business may also offer a different price, rate, level, or quality of goods or services to the consumer if that price or difference is directly related to the value provided to the business by the consumer's data. A business that offers any financial incentives must notify consumers of the financial incentives pursuant to California Civil Code § 1798.130. A business may enter a consumer into a financial

incentive program only if the consumer gives the business prior opt-in consent pursuant to California Civil Code § 1798.130 that clearly describes the material terms of the financial incentive program, and which may be revoked by the consumer at any time. A business must not use financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature. **Please note that the Credit Union does not offer the optional financial incentives covered under this provision.**

B. Categories of Personal Information that the Credit Union Collected in the Preceding 12 Months

The table below lists the categories of personal information that the Credit Union collected in the preceding 12 months, and provides additional related details.

Categories of Personal Information Collected in the Preceding 12 Months	Categories of Sources of Personal Information	Business or Commercial Purpose(s) for the Collection of Personal Information	Categories of Third Parties with whom the Credit Union Shares Personal Information
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	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Marketing and research (member satisfaction surveys, market polls, etc.) - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) - Regulatory compliance - Security (administrative, physical, and technical) of our premises and operations - Operation of our Websites 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, any other financial information, medical information, or health insurance information, and other personal information covered under California Civil Code § 1798.80(e)	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Marketing and research (member satisfaction surveys, market polls, etc.) - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) - Regulatory compliance - Security (administrative, physical, and technical) of our premises and operations - Operation of our Websites 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Characteristics of protected classifications (age, gender, race, etc.) under California or federal law	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Regulatory compliance 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Marketing and research (member satisfaction surveys, market polls, etc.) - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) - Regulatory compliance - Security (administrative, physical, and technical) of our premises and operations 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality

		- Operation of our Websites	
Biometric information, such as fingerprints and voiceprints	N/A (The Credit Union does not collect this information.)	N/A	N/A
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	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Marketing and research (member satisfaction surveys, market polls, etc.) - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) - Regulatory compliance - Security (administrative, physical, and technical) of our premises and operations - Operation of our Websites 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Geolocation data	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Marketing companies 	<ul style="list-style-type: none"> - Provision and administration of products/services - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Professional or employment-related information	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies - Regulatory agencies - Service providers, subject to confidentiality
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 C.F.R. Part 99)	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative 	<ul style="list-style-type: none"> - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting bureaus - Regulatory agencies - Service providers, subject to confidentiality
Inferences drawn from personal information in order to develop an outline of a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<ul style="list-style-type: none"> - Directly from the consumer, or an authorized representative - Consumer data resellers - Credit reporting agencies - Marketing companies - Public records 	<ul style="list-style-type: none"> - Provision and administration of products/services - Legal proceedings - Marketing and research (member satisfaction surveys, market polls, etc.) - Quality assurance and control / risk management functions (e.g. audit, fraud detection and prevention, etc.) - Regulatory compliance - Security (administrative, physical, and technical) of our premises and operations - Operation of our Websites 	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting bureaus - Regulatory agencies - Service providers, subject to confidentiality

C. Categories of Personal Information that the Credit Union Sold in the Preceding 12 Months

As previously noted, the Credit Union does not engage in the sale of the personal information covered under the CCPA. No such information was sold by the Credit Union within the preceding 12 months. For the purposes of this Online Privacy Policy, the term ‘sale’ is defined as the disclosure of personal information to another business or third party for monetary or other valuable consideration.

D. Categories of Personal Information that the Credit Union Shared for Business or Commercial Purposes in the Preceding 12 Months

The table below lists the categories of personal information that the Credit Union collected (and shared, for business or commercial purposes) in the preceding 12 months, and provides additional related details.

Categories of Personal Information Collected in the Preceding 12 Months	Has the Credit Union Shared this Personal Information for a Business or Commercial Purpose?	Categories of Third Parties with whom the Credit Union Shares Personal Information
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	Yes	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, HR, IT, legal, operational, processing, quality assurance, and web hosting services)
Signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, any other financial information, medical information, or health insurance information, and other personal information covered under California Civil Code § 1798.80(e)	Yes	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, HR, IT, legal, operational, processing, quality assurance, and web hosting services)
Characteristics of protected classifications (age, gender, race, etc.) under California or federal law	Yes	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, HR, IT, legal, operational, processing, quality assurance, and web hosting services)
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, IT, legal, operational, processing, quality assurance, and web hosting services)
Biometric information, such as fingerprints and voiceprints	N/A (The Credit Union does not collect this information.)	N/A
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	Yes	<ul style="list-style-type: none"> - Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics,

		HR, IT, legal, operational, processing, quality assurance, and web hosting services)
Geolocation data	Yes	- Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, IT, legal, operational, processing, quality assurance, and web hosting services)
Audio, electronic, visual, thermal, olfactory, or similar information	Yes	- Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, IT, legal, operational, processing, quality assurance, and web hosting services)
Professional or employment-related information	Yes	- Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, HR, IT, legal, operational, processing, quality assurance, and web hosting services)
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 C.F.R. Part 99)	Yes	- Your authorized representative - Service providers, subject to confidentiality (e.g. firms that provide, among other things, HR services)
Inferences drawn from personal information in order to develop an outline of a consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Yes	- Your authorized representative - Credit reporting agencies (e.g., Experian, Equifax, and TransUnion) - Regulatory agencies (e.g., NCUA, CFPB, and CA DBO) - Service providers, subject to confidentiality (e.g. firms that provide, among other things, actuarial, audit, data analytics, HR, IT, legal, operational, processing, quality assurance, and web hosting services)

10. Changes to Our Online Privacy Policy

In the ordinary course of its business, the Credit Union will review (and update, if needed) this Online Privacy Policy on at least an annual basis. The current version, which bears the date that the Online Privacy Policy was last updated, is accessible at <https://www.alturacu.com/disclosures>. Where updates are made to the Online Privacy Policy, your continued use of the Websites constitutes your acknowledgment and acceptance of those changes.

11. Contact Us

Questions about this Online Privacy Policy may be directed to:

Telephone inquiries: 888-883-7228
(Monday through Friday, 8 am – 6 pm PT)
(Saturday, 9 am – 1 pm PT)

Written inquiries: Altura Credit Union
P.O. Box 908
Riverside, CA 92502