

Teachers Federal Credit Union California Privacy Notice

Information for California Residents

Teachers Federal Credit Union (hereinafter referred as, “We,” “Our,” “Teachers,” or the “Credit Union,”) collect Personal Data from Consumers and comply with the California Privacy Rights Act (“CPRA”). This California Privacy Notice applies to California residents (“Consumers,” “you,” or “your”).

For the purposes of this California Privacy Notice, “Personal Data” means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Data:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of the CPRA.

This Privacy Notice provides the following information to California Consumers:

- Categories of Personal Data we collect;
- Purposes for which we use Personal Data;
- Categories of Personal Data we disclose to third parties;
- Categories of third parties to which we disclose Personal Data; and how Consumers can exercise their rights under the CPRA:
 - The rights to access, correct, or delete Personal Data;
 - The right to obtain a portable copy of Personal Data;
 - The right to limit the use of sensitive personal data in certain circumstances; and
 - The rights to opt out of the sharing of Personal Data for behavioral advertising, sales of personal data, or certain profiling.

Categories of Non-Sensitive Personal Data

The table below outlines the non-sensitive categories of Personal Data Teachers collects about Consumers and whether and how they are disclosed to third parties.

We collect Non-Sensitive Personal Data from the following sources:

- Directly from our users
- Inferences from your activity

Category of Personal Data: Identifiers
Examples
Identifiers may contain the following: information such as your browser's cookie identification files, email addresses and any information required pursuant to statutory legal obligations.
Purpose(s)
Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our services to you.
Targeted Advertising
We do not engage in targeted advertising or share Personal or Identifier Information for targeted advertising purposes.
Sale
We do not sell Personal or Identifier Information to anyone in accordance with our Privacy Policy.
Sharing
This data may be shared with our Processors.
Retention Period
We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.
Category of Personal Data: Personal Characteristics
Examples

Personal Characteristics may contain, but are not limited, to the following: Information such as your gender (if applicable), race and ethnicity depending on the types of services you engage with us (i.e., mortgage lending) and age.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our services to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Identifier Information for targeted advertising purposes.

Sale

We do not sell Personal or Identifier Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

**Category of Personal Data:
Commercial Information**

Examples

Commercial Information may contain the following: Information such as past financial history to comply with legal and statutory obligations.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our services to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Commercial Information for targeted advertising purposes.

Sale

We do not sell Personal or Commercial Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Category of Personal Data: Internet/Electronic Activity

Examples

Internet/Electronic Activity may include, but is not limited to, the following: information pertaining to your Internet/Electronic activity such as your IP address, Internet Service Provider (ISP) geographic location, cookies, if applicable, and email addresses.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Internet/Electronic Information for targeted advertising purposes.

Sale

We do not sell Personal or Internet/Electronic Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

**Category of Personal Data:
Imprecise Geolocation**

Examples

Imprecise Geolocation may contain the following: any data that is derived from an electronic device such as your mobile phone or your computer. This information provides us with an imprecise geographic location of your Internet Service Provider and mobile or physical device as applicable.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Imprecise Geographic Information for targeted advertising purposes

Sale

We do not sell Personal or Imprecise Geographic Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Category of Personal Data: Sensory Information

Examples

Sensory Information may include the following: video and audio recordings.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Sensory Information for targeted advertising purposes.

Sale

We do not sell Personal or Sensory Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Category of Personal Data: Professional Information

Examples

Professional Information may contain the following: your past or current occupation and/or employer.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Professional Information for targeted advertising purposes

Sale

We do not sell Personal or Professional Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Category of Personal Data: Inferences

Examples

Inferences may contain the following: using internal proprietary software analytics, "inferences," may be drawn upon the information we collect. These inferences may include, but are not limited to: significant life events such as graduation or marriage.

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Inference Information for targeted advertising purposes.

Sale

We do not sell Personal or Inference Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Categories of Sensitive Personal Data

The table below outlines the categories of Sensitive Personal Data we collect about Consumers and whether they are shared with third parties. Teachers obtains affirmative consent from Consumers to process the Sensitive Personal Data, in compliance with applicable law.

We collect Sensitive Personal Data from the following sources:

- Directly from our users
- Inferences from your activity

Category of Sensitive Personal Data: Government ID Data
Examples
Government ID Data may contain, but is not limited to, the following: Social security number, Government Issued Identification (Inclusive of Passports, Driver's Licenses, Identification Cards, Resident Alien Cards).
Purpose(s)
Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.
Targeted Advertising
We do not engage in targeted advertising or share Personal or Government ID Information for targeted advertising purposes.
Sale
We do not sell Personal or Government ID Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

Category of Sensitive Personal Data: Sensitive Category Data

Examples

Sensitive Category Data may contain the following:

- individual’s social security, driver’s license, state identification card, or passport number;
- account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- precise geolocation;
- racial or ethnic origin, religious or philosophical beliefs, or union membership;

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our service to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Sensitive Information for targeted advertising purposes.

Sale

We do not sell Personal or Sensitive Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud.

**Category of Sensitive Personal Data:
Financial Data**

Examples

Financial Data may contain, but is not limited to, the following: Financial account information (inclusive of credit or debit card numbers, credit history and account numbers).

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Financial Information for targeted advertising purposes.

Sale

We do not sell Personal or Financial Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data only to the extent required by applicable law or for purposes of preventing fraud and complying with statutory obligations.

**Category of Sensitive Personal Data:
Biometric Data**

Examples

We do not collect, store or retain Biometric Data of any kind.

Purpose(s)

We do not collect, store or retain Biometric Data of any kind.

Targeted Advertising

Not applicable as we do not collect, store or retain Biometric Data of any kind.

Sale

Not applicable as we do not collect, store or retain Biometric Data of any kind.

Sharing

Not applicable as we do not collect, store or retain Biometric Data of any kind.

Retention Period

Not applicable as we do not collect, store or retain Biometric Data of any kind.

Category of Sensitive Personal Data: Precise Geolocation Data

Examples

Precise Geolocation Data may contain the following: information derived from GPS or other similar technology that directly identifies the specific location of an individual with precision and accuracy within a radius of 1,850 feet (a third of a mile). This also includes information such as your location and IP address. We may also collect certain information regarding your Internet Service Provider (ISP).

Purpose(s)

Compliance with applicable federal and state laws and the avoidance of fraud. We may also collect this information to improve upon our services to you.

Targeted Advertising

We do not engage in targeted advertising or share Personal or Geolocation Information for targeted advertising purposes.

Sale

We do not sell Personal or Geographic Information to anyone in accordance with our Privacy Policy.

Sharing

This data may be shared with our Processors.

Retention Period

We retain this data until only to the extent required by applicable law or for purposes of preventing fraud and complying with legal statutory obligations.

Use of Personal Data

We use Personal Data for the purposes described above. Personal Data may also be used or disclosed as otherwise permitted or required by applicable law.

Disclosing Personal Data

We share Personal Data with the following categories of third parties:

- Processors: We use processors to securely handle Personal Data on our behalf and only on our instructions. These companies may not use your Personal Data for their own purposes.
- Government or Law Enforcement Agencies: We may share this information pursuant to statutory or legal obligations in the event of a legal claim or subpoena by appropriate parties to comply with federal or state laws.

See the tables above for more details about how different categories of Personal Data are shared.

We do not sell Personal Data to anyone.

Exercising Your Personal Data Rights

California Consumers have the following rights under the CPRA:

- The rights to access, correct, or delete Personal Data;
- The right to obtain a portable copy of Personal Data;
- The right to limit the use of Sensitive Personal Data in certain circumstances; and
- The rights to opt out of the sharing of Personal Data for behavioral advertising, sales of personal data, or certain profiling.

If you are a California Consumer, you can submit a request to exercise your personal data rights under the CPRA by sending an email to privacy@teachersfcu.org with the subject line, "Privacy Rights Request" or by calling us at 866-832-8669. To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will use commercially reasonable efforts to verify your identity for this purpose. Any information you provide to authenticate your identity will only be used to process your rights request. Please be aware that

we do not accept or process rights requests through other means (e.g., via fax, online web chat, physical mail or social media).

After submitting your request, you will receive a follow-up email, which *may* include a link you must click on in order to verify your identity. If you do not click on that link, we may be unable to complete your request due to lack of verification. It is important that you provide a valid email address in order for us to be able to process your request.

We will respond to your rights request within forty-five days, though in certain cases we may inform you that we will need up to another forty-five days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Please note that under some circumstances, reasonable exceptions may need to be made.

We reserve the right to decline to process, or charge a reasonable fee for, requests from a Consumer that are manifestly unfounded, excessive, or repetitive.

Limiting the Use of Sensitive Personal Data

The CPRA provides a right to limit some uses of Sensitive Personal Data. In particular, you may direct companies not to use Sensitive Personal Data except as necessary to provide goods or services you have requested.

You may submit a request to limit the use of your sensitive Personal Data by submitting a rights request as described above.

Authorized Agent Requests

The CPRA allows you to designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require additional materials to authenticate the verification of your authorized agent (in addition to the information for verification above for Consumers and households).

Contact Us

If you have any questions or concerns regarding this California Privacy Notice, contact us at privacy@teachersfcu.org or 866-832-8669.

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