

# PRIVACY POLICY

## FACTS

### WHAT DOES PROVIDENCE FEDERAL CREDIT UNION DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand Providence Federal Credit Union's Privacy Policy.

At Providence Federal Credit Union, we respect the privacy of our members. We recognize the importance of maintaining the confidentiality of your personal financial information. This notice describes the privacy policy and practices followed by Providence Federal Credit Union. This notice explains what types of member information we collect and under what circumstances we may share it.

#### What?

The types of personal information we collect and share depend on the accounts or services you have with us. This information can include:

- Name, address, Social Security Number, and income
- Account balances and transaction history
- Credit history and credit scores

When you are *no longer* our member, we will not share your information except as permitted or required by law as described in this notice.

#### How?

All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Providence Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Providence Federal Credit Union share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For non-affiliates to market to you</b>	No	We don't share

#### Questions?

Call (888) 849-5189 or (503) 215-6090, visit [www.providencecu.org](http://www.providencecu.org) or write us at Providence Federal Credit Union, 6400 SE Lake Road, Suite 125, Milwaukie, OR 97222.

What we do	
<b>How does Providence Federal Credit Union protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also restrict access to nonpublic personal information about you to those employees and volunteers who need to know the information to provide products or services to you.
<b>How does Providence Federal Credit Union collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or apply for a loan</li> <li>■ apply for any credit union service</li> <li>■ you visit our website, provide us information on any online application or transaction, or information you send to us by email.</li> <li>■ use your credit or debit card or pay your bills</li> <li>■ make deposits to or withdrawals from your accounts</li> </ul> <p>We also collect your personal information from others, including credit bureaus or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law only gives you the right to limit information sharing as follows:</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for non-affiliates to market to you</li> </ul> <p>However, we do not have any affiliates with whom we share any information.</p>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Providence Federal Credit Union has no affiliates.</i></li> </ul>
<b>Non-affiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Providence Federal Credit Union does not share with non-affiliates so they can market to you except for our joint marketing arrangements.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between Providence Federal Credit Union and a nonaffiliated financial company where we jointly market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Our joint marketing partners include financial service providers.</i></li> </ul>



## CALIFORNIA PRIVACY POLICY

### California Consumer Privacy Act (CCPA) – Privacy Policy Disclosures

#### Your Personal Information Protections

##### What is Personal Information?

*Personal Information.* Under California law your “Personal Information” includes the following data that identifies, relates to or may be associated with you:

- Demographic information (i.e., name, address, email),
  - A unique identifier, such as an IP address,
  - Account or Social Security Number,
  - Driver’s license or passport,
  - Personal property records,
  - Card numbers,
  - Access codes (PINs & passwords)
  - Online activity,
  - Biometric, geolocation, employment and education data,
  - Browsing and search history, and
  - Information concerning a consumer’s interaction with a website.
- Personal information also includes information that is identifiable to your household.

#### Credit Union Collection of Member Personal Information

##### Categories of Member Personal Information We Collect

Your personal information that we collect may include:

- Personal identifier information: name, email address, social security number, driver’s license number, access codes.
- Account & transaction information: account number, card number, account information, transaction information, and credit information and required consents, opt-in & opt-out requests.

##### Where We Collect Member Personal Information

We collect the categories of personal information listed above when you: visit our website or submit an online application, conduct any branch, mail or online transaction, use the Personal Finance Manager program or send us an e-mail, or phone inquiry.

#### Purposes for Which Credit Union Uses & Shares Member Personal Information

##### How We May Use Member Personal Information

We may use each category of personal information we collect for the following purposes: To verify the identity of the person conducting the account transaction or inquiry with us or our service providers

- To fulfill account or service requests that you initiate
- To prevent fraud or meet legal requirements.

We have never sold and we will not sell any of your personal information to anyone.

##### How We May Share Member Personal Information

We may share your personal identifiable information with 1) our third-party service providers and payment processor to facilitate your services or transactions, or 2) other financial companies with whom we have a joint marketing agreement that protects your personal information.

<b>How Long We Will Retain Member Personal Information</b>	We will retain your personal information so long as we need to use such information to maintain your account and services and as otherwise required by law, subject to your right request us to delete your personal information.
<b>Your Rights to Protect Your Personal Information</b>	
<b>Right to Request Access to Your Personal Information</b>	<ul style="list-style-type: none"> <li>You have a right to access your personal information that we have collected. Upon your request by mail, email or in person to the Credit Union, we will disclose any of the following information requested:</li> <li>The categories of personal information collected;</li> <li>The sources from which personal information was collected;</li> <li>Our purpose for collecting the information;</li> <li>The categories of third parties with whom we share personal information;</li> <li>The specific pieces of your personal information we have collected.</li> </ul>
<b>Right to Request Your Personal Information Be Deleted</b>	<p>You have the right to request that we delete personal information about you that we have collected. Upon your verifiable request by mail, email or in person to the Credit Union, we will delete the information and direct our service providers to delete the information from its records unless we or service provider needs the personal information. The following are the exceptions where the Credit Union and our service providers need the personal information to maintain and service your account and cannot delete the information:</p> <ul style="list-style-type: none"> <li>To process your transactions for which the personal information was collected,</li> <li>To provide the account or service requested,</li> <li>To detect security incidents; protect against fraudulent, or illegal activity;</li> <li>To identify and correct any Credit Union systems errors,</li> <li>To comply with the California Electronic Communications Privacy Act;</li> <li>To operate the systems and applications to maintain your accounts and services,</li> <li>To comply with a legal obligation or in a lawful manner compatible with the context in which you provided the information</li> </ul>
<b>Right to Correct Inaccurate Information</b>	You have the right to request Credit Union to correct any personal information of yours that is inaccurate.
<b>Right to Opt-out of Sharing or the Sale of Your Personal Information</b>	<p>You have the right to opt-out of any sharing of your personal information by Credit Union with third parties, except our sharing with (i) our third-party service providers and payment transaction processors to facilitate your services or transactions, or (ii) other financial companies with whom we have a joint marketing agreement that protects your sensitive personal information.</p> <p>The Credit Union does not sell any member personal information to any third party.</p>
<b>Your Sensitive Personal Information Protections</b>	
<b>What is Sensitive Personal Information?</b>	<p><i>Sensitive Personal Information.</i> Under California law your "Sensitive Personal Information means Personal Information that reveals information about your:</p> <ul style="list-style-type: none"> <li>Social Security Number,</li> <li>Driver's license, state ID card or passport number,</li> <li>Account access(log-in) credentials and account/card number in combination with a security/access code (PIN/Password) to access your account,</li> <li>Precise Geolocation or biometric identification data about you,</li> <li>Racial or ethnic origin, religious or philosophical beliefs or union membership, or sexual orientation,</li> <li>Contents of your email, mail or text messages unless The Credit Union is the intended recipient, and</li> <li>Genetic personal information.</li> </ul>
<b>Credit Union Collection of Member Sensitive Personal Information</b>	

<b>Categories of Member Sensitive Personal Information We Collect</b>	<p>Your sensitive personal information that we collect may include:</p> <ul style="list-style-type: none"> <li>• Social Security Number,</li> <li>• Driver's license or passport number,</li> <li>• Account access credentials,</li> <li>• Geolocation or biometric data about you,</li> <li>• Racial or ethnic origin, religious or philosophical beliefs or union membership, or sexual orientation, and</li> <li>• Contents of your email, mail or text messages unless The Credit Union is the intended recipient.</li> </ul>
<b>Purposes for Which Credit Union Uses &amp; Shares of Member Sensitive Personal Information</b>	
<b>How We May Use Member Sensitive Personal Information</b>	<p>We may use each category of sensitive personal information we collect for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify the identity of the person conducting the account transaction or inquiry with us or our service providers</li> <li>• To fulfill account or service requests that you initiate</li> <li>• To prevent fraud or meet legal requirements.</li> </ul> <p>We have never sold and we will not sell any of your sensitive personal information to anyone.</p>
<b>How We May Share Member Sensitive Personal Information</b>	<p>We may share your sensitive personal identifiable information with 1) our third-party service providers and payment transaction processors to facilitate your services or transactions, or 2) other financial companies with whom we have a joint marketing agreement that protects your sensitive personal information.</p>
<b>How Long We Will Retain Member Sensitive Personal Information</b>	<p>We will retain your sensitive personal information so long as we need to use such information to maintain your account and services and as otherwise required by law, subject to your right request us to delete your sensitive personal information</p>
<b>Your Rights to Protect Your Sensitive Personal Information</b>	
<b>Right to Limit the Use and Disclosure of Sensitive personal Information</b>	<p>You have the right to request the Credit Union to limit the use and disclosure of the following sensitive personal information of yours for purposes other than what is reasonable and beneficial to you: precise geolocation data; racial and ethnic origin; union members; contents of certain email or text messages, and biometric information.</p>
<b>Additional Rights and Protections</b>	
<b>Right to Equal Services &amp; Pricing</b>	<p>You have the right to receive equal service and pricing from us even if you choose to exercise any of your privacy rights. We will not discriminate against you for exercising any of the consumer's rights, including:</p> <ul style="list-style-type: none"> <li>• denying accounts or services to you;</li> <li>• charging different prices or rates for accounts or services or imposing penalties;</li> <li>• providing a different level or quality of accounts or services to you or suggesting that you will receive a different price or rate for accounts or services or a different level or quality of accounts or services</li> </ul>
<b>How to Submit Requests to the Credit Union or Contact Us for More Information.</b>	<p>You may submit your requests to the Credit Union as follows:</p> <p><i>In person</i> – at the Providence Federal branch: 6400 SE Lake Road, Suite 125, Milwaukie, OR 97222</p> <p><i>Mail:</i> Providence Federal Credit Union, 6400 SE Lake Road, Suite 125, Milwaukie, OR 97222</p> <p><i>Web Form:</i> <a href="http://www.providencecu.org/contact-us/">www.providencecu.org/contact-us/</a></p> <p>You may designate an authorized agent to submit requests on your behalf by providing us with your written authorization of the agent and nature of your request.</p> <p>We will verify your request by using our current authentication practices including matching the identity information you provide with your request with your personal information we maintain on file.</p>
<b>Additional Online Privacy Protections</b>	<b>Use of Cookies</b> Providence Federal Credit Union uses cookies when you visit our website. These cookies are essential for enabling user movement around our website and providing

	<p>access to features such as your member-only resources, online banking, and other secure areas of the website. These cookies do not gather information about you that could be used for marketing purposes and do not remember where you have been on the internet and Providence Federal does not track or sell this data. This category of cookies cannot be disabled.</p> <p><b>California Do Not Track Disclosures.</b>          Certain web browsers offer a "Do Not Track" (DNT) option that permits users to select a preference not to have information about web browsing activities monitored and collected. Our website will not honor DNT signals from you and we will not monitor or collect information of your browsing activity.</p>
	<p>Our Privacy Policy is posted on our website <a href="http://www.providencecu.org">www.providencecu.org</a>          You can reach us: Toll-free at          888.849.5159 or 503.215.6090</p>
<p><b>Amendments to Privacy Policy</b></p>	
<p>Providence Credit Union may update this Privacy Notice at any time to reflect changes in our business, legal or regulatory requirements. If we may make any material changes to this Privacy Notice we will notify you before the changes are effective by mail or email if you have chosen email communication. Any changes to this Privacy Notice will be effective on the date we designate as the effective date or as required by law. Please visit <a href="https://www.providencecu.org/privacy/">https://www.providencecu.org/privacy/</a> for our current Privacy Notice.</p>	