

**BCU**  
**Privacy Policy for California Residents**  
**Effective Date: January 1, 2020**  
**Last Updated: April 6, 2023**

Baxter Credit Union (“BCU” or “we” or “us”) provides this Privacy Policy for California Residents, which supplements the information contained in BCU’s Privacy Policy and Privacy Notice (the “Privacy Policy” and “Privacy Notice”) and applies **solely** to California Residents (“You”). We adopt this Policy to comply with the California Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and other applicable, California privacy laws. Any terms defined in the CCPA and CPRA have the same definition as used in this Policy for California Residents.

**What Personal Information We Collect**

We collect information that identifies, relates to, references, describes, or is capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of information in the last 12 months.

<b>Category</b>	<b>Examples</b>	<b>Collected?</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license, passport number, or other similar identifiers.	Yes
B. Personal Information categories listed in the California Customer Records Statute (CA Civil Code 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state ID card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number or any other financial information. Some personnel information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex/gender, sexual orientation, veteran or military status.	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained or considered, or other purchasing or consumer histories, or tendencies.	Yes

E. Biometric information as Defined in the CCPA.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as facial recognition, voice recordings, retina scans, fingerprints, keystroke, gait or other physical patterns.	Yes (1)
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	Yes
H. Sensory data.	Audio, electronic, visual, thermal, olfactory or similar information.	Yes
I. Professional or employment-related information.	Current or past job history.	Yes
J. Non-public education information.	Education records directly related to a student maintained by an educational institute or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities, and aptitudes.	Yes
L. Sensitive personal information	Personal information that reveals a consumer’s social security, driver’s license, or state identification card, a consumer’s account log-in or financial account that may be kept in combination with required credentials or passwords in order to open an account, a consumer’s geolocation, and a consumer’s racial or ethnic origin as required by federal law. Passwords and other “credentials” are encrypted at rest.	Yes

(1) Biometric information is limited to our use of one or more third-party providers that provide voice authentication services for the business purpose of preventing fraud and misuse.

Personal information does **not** include:

- Publicly available information.
- De-identified or aggregated consumer information.
- Information excluded from CCPA's scope, such as:
  - Health or medication 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.
  - Personal information covered by certain sector- specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Drivers Privacy Protection Act of 1994.

### **How We Collect Your Personal Information**

We obtain the categories of personal information listed above from the following categories of sources.

- Directly from our members, through applications for membership or applications for credit, with related documentation requirements.
- In certain cases, indirectly from employers, either employee listings from the companies we serve, or employment verification related to the extension of credit.
- Directly and indirectly from activity on our website. For example, from submissions through our chat, message center, or online banking system.
- Directly through recording of interactions with digital or live service agents.
- From third-parties that provide services for the transactions and products that we provide. For example: loan servicing providers, collection agencies, credit reporting agencies, document providers, and other providers.

### **How We Use Your Personal Information**

We may use and/or process the personal information we collect about you for one or more of our legitimate business purposes. For example, we may use your information:

- To provide you with information, products and services you request from us.
- For regulatory compliance purposes (i.e. Bank Secrecy Act, Home Mortgage Disclosure Act, Flood Act, etc.).
- To provide you with alerts and other notices related to your transactions.
- To recommend products or services that may be of interest to you.
- To improve products, services and channels that may be of benefit to you.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- To evaluate or conduct a merger, or other sale of assets, such as selling mortgage loans to Federal National Mortgage Association (FNMA), in which personal information held by us is among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in CCPA.

### **How We Share Your Personal Information**

We do not believe that we “sell” your “personal information” as such terms are defined by the CCPA and, accordingly, we do not offer a “do not sell” opt-out. Over the past twelve (12) months we have engaged in the use of third party cookies and pixels to obtain online identifiers, device information, and internet

or other electronic network activity information, and provided this information to third party service providers. The third-party service providers only use deidentified data for purposes of facilitating and improving existing services as well as for reporting purposes. We do not knowingly sell the personal information of consumers under 18 years of age. For more information on how BCU uses third party tracking technologies, please see our [Cookies and Pixels Policy](#).

We may share information about you, including personal information, with our affiliates, who are subject to this Privacy Policy for California Residents or follow practices at least as protective as those described here, or with service providers with whom we have entered into contracts that require personal information be kept confidential and prohibit the retention, use, or disclosure of personal information for any purpose other than the services specified.

Specifically, BCU may share or disclose information as described below:

- **Within the BCU Family:** We may share personal information internally within BCU and with our affiliates, unless you have opted-out of our sharing the information. BCU's personnel may have access to personal information as needed to provide and operate the Website in the normal course of business. This includes the following categories of personal information: identifiers, customer or member records, commercial information, internet or other network activity, and inferences drawn from personal information.
- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf, sending mail, analyzing data, providing marketing assessments, providing analytics information, processing certain payments, and providing data hosting (as specified herein). They have access to information needed to perform their functions, but not for other purposes. We also use third-party service providers for reporting and similar purposes, but these service providers only have access to deidentified data.
- **Business Transfers:** If we purchase other businesses or their assets, sell our business assets, or are involved in a merger, acquisition, reorganization or sale of assets, your information, including any category of personal data collected by BCU, may be among assets sold or transferred and may be subsequently used by a third-party.
- **Lawful Requests and Safety:** We release personal information when we believe it is required or permitted by applicable law, it is necessary to protect our interests, to prevent fraud or other illegal activity, and to protect the safety of any person. Nothing in this Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.
- **Aggregated/De-identified information:** Collected personal information may be shared or disclosed after it is aggregated and/or deidentified. This means that we remove any details that identify or relate to you personally or could reasonably be linked directly or indirectly with you. We may then share this aggregated and/or deidentified information with third-party providers to help deliver products, services and content that are better tailored to users of our online services and for our own business purposes where permissible under applicable laws and regulations.

Over the past twelve (12) months, we have shared the following categories of personal information with other members of our family, our service providers and third parties with which you have agreed we can share your information: identifiers, customer records, commercial information, internet or other network activity, geolocation data, and inferences drawn from personal information.

### **Your Rights and Choices**

The CCPA and CPRA gives California residents specific rights about our collection and use of the personal information we have collected, used, and disclosed over the past twelve (12) months. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

The CCPA and CPRA gives California Residents the right to ask us about our collection and use of the personal information we have collected, used and disclosed over the past twelve (12) months. To do so, you can submit a verifiable consumer request (“Request to Know”). Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories 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 with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a Data Portability Request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Limit Use and Disclosure of Sensitive Personal Information***

The CPRA now gives California Residents the right to limit the use and disclosure of sensitive personal information (“Right to Limit”). BCU does not collect, use, or disclose sensitive personal information without your prior consent, and we only use the sensitive personal information as necessary to perform the services you want or have requested. We only retain sensitive personal information for as long as reasonably necessary to fulfill the purpose disclosed upon collection.

### ***Correction and Deletion Request Rights***

California Residents have the right to request that we correct inaccurate personal information or delete the personal information that we collected from you and retained (“Requests to Correct” or “Requests to Delete”). Once we receive and confirm your verifiable consumer request, we will correct or delete (and direct our service providers to correct or delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a product or service that you requested, or take actions reasonably anticipated within the context of our ongoing business relationship with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Comply with applicable state and federal regulations or comply with a legal obligation or otherwise using the personal information, internally, in a lawful manner.
4. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
5. For a purpose otherwise contemplated by Cal. Civ. Code Section 1798-105(c)-(d) and as amended.

***Exercising Access, Data Portability, Limit Use, Correction, and Deletion Rights***

You may make a verifiable customer request for access or data portability twice within a 12-month period. To exercise the access, data portability, limit use, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Mailing us your request:                   Attn: Privacy Requests  
  340 N. Milwaukee Ave  
  Vernon Hills, IL 60061
- Emailing us at [PrivacyRequests@bcu.org](mailto:PrivacyRequests@bcu.org)
- Calling us at 800-388-7000

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. If the request is made through an agent, we reserve the right to require a signed authorization or verification of the agent's identity from you in order protect the privacy of the personal information requested. You may also make a verifiable consumer request on behalf of your minor child.

Should you call us or visit the website we've shown above, you can access the form for making a verifiable request. Generally, your verifiable 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.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot provide you with information sought in a Request to Know or comply with a Request to Correct or Delete, if we cannot verify your identity or authority to make the request and/or confirm the personal information relates to you. Therefore, we reserve the right to request additional information from you to allow us to verify your request before we respond. We also reserve the right to refuse a Request to Know, a Request to Correct, or a Request to Delete, if we believe the request is fraudulent or may compromise the security of personal information. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

***Response Timing and Format***

We'll let you know that we received your request within ten (10) days of receipt and give you information regarding how we will process your request and will endeavor to provide a response to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we

cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services, provided you qualify for membership in the Credit Union, and in the case of loans, provided you meet our criteria for extending credit.
- Charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of products or services, unless we are legally required to provide a different “level” of products or services per federal or state law.
- Suggest that you may receive different costs or rates for products or services or a different level or quality of products or services.

We may offer certain financial incentives permitted by the CCPA and CPRA that can result in different prices, rates or quality levels. Any CCPA or CPRA-permitted financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects.

**Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

**Contact Information**

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: [www.bcu.org](http://www.bcu.org)  
Email: [PrivacyRequests@bcu.org](mailto:PrivacyRequests@bcu.org)  
Phone: 800-388-7000

Mail To: BCU  
Attn: Privacy Requests  
340 N. Milwaukee Ave.  
Vernon Hills, IL 60061