

Privacy Notice for the California Consumer Privacy Act

About This Notice

This notice describes your rights and how we collect, use, retain, and disclose the personal information of California residents (“you”) under the California Consumer Privacy Act of 2018 (CCPA). It supplements the information in our other privacy notices. This notice applies only to California residents and their personal information.

This notice is provided jointly by the organizations that make up Global (“we” or “us”), including:

- » Global Federal Credit Union;
- » Global Credit Union Home Loans, LLC (including dba Procura Mortgage Company);
- » Global Credit Union Insurance Brokers, LLC;
- » First Financial Northwest Operated by Global Federal Credit Union; and
- » FFWN Operated by Global Federal Credit Union.

You may contact us with questions or concerns about this notice and our information practices by:

- » Emailing us at memberservice@globalcu.org or
- » Calling our Member Service Center at 800-525-9094.

Definitions provided in this notice may vary from definitions in other notices. For purposes of this notice:

- » **Personal information** means any information that is, or reasonably could be, linked to a particular individual or household. This information is divided into several categories under the CCPA.
- » **Sensitive personal information** means personal information that falls into certain special categories under the CCPA.
- » **Third party** means a person or company other than Global Federal Credit Union, our similarly branded affiliates, or our contractors or service providers.
- » **Sharing** means disclosure to a third party for purposes of cross-context behavioral advertising.
- » **Selling** means disclosure to a third party in exchange for anything of value.

The CCPA exempts from most of its requirements certain information, activities, or entities already protected by other laws. Much of the personal information we collect is already regulated by these or other laws. For example, the CCPA exempts:

- » Information subject to the requirements of the Gramm-Leach-Bliley Act (GLBA), which applies to most personal information collected while providing financial services for personal or household purposes;
- » Activities governed by the Fair Credit Reporting Act (FCRA), such as providing your personal information to credit reporting agencies or obtaining credit reports about you; and
- » Information subject to the Driver’s Privacy Protection Act.

We may change this notice from time to time. When we do, we will post the revised version on our websites with a new date.

How We Secure Your Personal Information

Keeping your personal information secure and private is among our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, and organizational safeguards to protect your personal information against improper access, disclosure, alteration, retention, and destruction.

Your Rights

Subject to some limitations, you have the right to:

- » Opt out of the sale and sharing of your personal information.
- » Know what information we have collected about you; the categories of sources from which we collect personal information; our purposes for collecting, sharing, or selling that information; and the categories of third parties to whom we disclose personal information.
- » Know what information we have sold or shared about you.
- » Obtain a copy of your personal information from us.
- » Request that we erase your personal information and direct those we've provided with your personal information to do the same.
- » Request that we correct personal information about you.
- » Be free from discrimination or retaliation for exercising your rights under the CCPA, including exercise of your rights as an employee, applicant, or independent contractor.

Within 10 days of receiving your request, we will acknowledge your request and provide information about how we will process the request.

We accept and process requests directly from you or from your authorized agent in the same manner, subject to verification of authorization as outlined below.

To verify your identity or to verify your representative's authorization to make a request on your behalf, we may request further information or action. If we cannot adequately verify your identity or your representative's authorization to submit a request on your behalf, we may decline all or part of a request. We will notify you of our decisions. Verification helps protect you from identity theft or other violations of your privacy. At our discretion, and depending on the risks posed by a request, we may ask that you verify access to your email address or phone number, provide documents to identify you or to demonstrate your authority to make a request on another individual's behalf, or make your request in person. If your authorized agent makes a request on your behalf, we may require that you identify yourself directly.

If we cannot complete your request within 45 days, we will notify you that we are extending the request and provide you with an explanation for the delay. We may take up to an additional 45 days, for a total of 90 days from the date you submit your request.

If your request is excessively difficult, we may reach out to you to gather more specific information about your request. If you make unfounded or excessive requests, we may decline them.

To exercise your rights to deletion, correction, or access to your personal information under the California Consumer Privacy Act, you can:

- » Visit www.globalcu.org/privacy to submit a Privacy Rights Request;
- » Call our Member Service Center at 800-525-9094; or
- » Visit a Global branch.

You can opt out of the sale and sharing of your personal information by:

- » Setting your browser to send an Opt Out Preference Signal (also known as a Global Privacy Control) or
- » Visiting www.globalcu.org/privacy or clicking the link on our website that says "Do Not Sell or Share My Personal Information."

Global Information Practices

The specific personal information that we collect, use, retain, and disclose, and the purposes for disclosure, may vary depending on the relationship you have with Global, including the products or services you obtain from us.

Why We Collect Your Personal Information

We use your personal information in many ways to operate, manage, and develop our business and to provide our products and services to you, including for the following:

- » Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- » Securing our information systems, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- » Undertaking activities to verify or maintain the quality or safety of services controlled by us, and to improve, upgrade, or enhance the service controlled by the business;
- » Debugging to identify and repair errors that impair existing intended functionality;
- » Short-term, transient use where the information is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- » Marketing and advertising our products and services;
- » Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- » Undertaking internal research for technological development and demonstration; and
- » Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

Sources of Personal Information

We collect or have collected your personal information from sources that may include, depending on your relationship with Global:

- » You, your representatives, your family, and your business associates;
- » Service providers, contractors, and third parties;
- » Public records, including federal, state, and local government sources;
- » Our affiliates;
- » Social media; and
- » Our websites and mobile apps.

Personal Information

We collect, use, and disclose personal information for a business purpose as follows, and have done so over the previous 12 months:

Categories of Personal Information	Do we collect, use, and disclose for a business purpose?	Do we disclose to third parties?
Identifiers, such as name, government-issued identifiers such as Social Security number, account numbers, email address, or online identifiers such as IP address.	Yes	Yes – to government entities for a business purpose, and to advertising partners for cross-context behavioral advertising.
Other records protected under California law, including insurance or financial information.	Yes	Yes – to government entities for a business purpose.
Characteristics of protected classifications under California or federal law, such as sex and marital status.	Yes – for example, when you apply for employment or insurance.	Yes – to government entities for a business purpose.
Commercial information, such as transaction information and purchase history.	Yes	Yes – to government entities for a business purpose.
Biometric information, such as voice recordings or behavioral characteristics.	Yes – for example, we may record telephone calls and interactions in our branches.	Yes – to government entities for a business purpose.
Internet or network activity information, such as browsing history.	Yes	Yes – to government entities for a business purpose, and to advertising partners for cross-context behavioral advertising.
Geolocation data, such as device location and Internet Protocol (IP) address location.	Yes – when you visit our websites or branches or use your credit or debit card.	Yes – to government entities for a business purpose, and to advertising partners for cross-context behavioral advertising.
Audio, electronic, visual, and similar information, such as call and video recordings.	Yes – for example, when you call us or visit a branch or ATM.	Yes – to government entities for a business purpose.
Professional or employment-related information, such as work history and prior employer.	Yes – for instance, when you submit an application for a loan or employment.	Yes – to government entities for a business purpose.
Education information, such as student records and directory information.	Yes – such as when you submit your resume or transcripts as part of an application for a loan or employment, or when you apply for a good student discount.	Yes – to government entities for a business purpose.

Sensitive Personal Information

We collect, use, and disclose your information for a business purpose as follows, and have done so over the previous 12 months:

Categories of Sensitive Personal Information	Do we collect, use, and disclose for a business purpose?	Do we disclose to third parties for a business purpose?
Social Security, driver's license, state identification card, or passport number.	Yes – including to uniquely identify you and for tax reporting purposes.	Yes – to government entities for a business purpose.
Account access information such as username, or 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.	Yes – for example, to provide you with debit and credit card services and online access to your account.	Yes – to government entities for a business purpose.
Geolocation within the area of a circle with a radius of 1,850 feet.	Yes – for example, through electronic activity, provision of services, or other interactions.	Yes – to government entities for a business purpose.
Racial or ethnic origin, religious or philosophical beliefs, or union membership.	Yes – for example, to comply with equal opportunity laws in lending and employment.	Yes – to government entities for a business purpose.
The contents of messages (such as letters, email, or text) except where we are the intended recipient of the communication.	Yes – for example, messages you send to other organizations about our products or services or your interactions with us.	Yes – to government entities for a business purpose.
The processing of biometric information for the purpose of unique identification.	Yes – for example, we may use call recordings to identify individuals.	Yes – to government entities for a business purpose.
Information collected and analyzed concerning health.	Yes – employees only. Our health insurance provider may collect and use this information to provide health insurance services.	Yes – to government entities for a business purpose.
Information collected and analyzed concerning sex life or sexual orientation.	Yes – employees only. Our health insurance provider may collect and use this information to provide health insurance services.	Yes – to government entities for a business purpose.

Global uses sensitive information only for purposes which are not subject to the right to limit under the CCPA and applicable regulations.

Retention Periods

For each of the categories of personal information and sensitive personal information above, we retain the information according to our retention policies for as long as necessary:

- » To provide our products, services, or benefits to you;
- » For compliance and legal purposes;
- » For security and fraud prevention purposes;
- » To facilitate resolution of credit and transaction disputes;
- » To market, maintain, and improve products and services;
- » To maintain and improve systems, operations, and facilities;
- » To develop new products and services; and
- » For other purposes compatible with the purposes and context of collection.

Retention periods vary by the type of transaction, interaction, or relationship for which the personal information was collected.

Third-Party Disclosure, Sharing, and Selling

We may disclose your personal information to the following categories of third parties:

- » Businesses which provide us with services related to digital marketing, including infrastructure, ad placement, and analysis; and
- » Government entities as required or permitted by laws or regulations.

If you are 16 years old or older, we can sell or share your personal information unless you opt out. However, if we know that you are less than 16 years old, we must obtain consent to share or sell your information. If you are 13-15, you can provide consent. If you are under 13, your parent or guardian can provide consent.

We share your personal information for purposes of cross-context behavioral advertising unless you tell us not to or we know you are less than 16 years old in the context of sharing. We do not knowingly share the personal information of individuals less than 16 years old. We share this information with third parties who place ads or help us optimize ad placement. The information we share is focused on improving the relevance of the advertising you see, for example to avoid advertising services to you that you already receive from us.

To the extent that sharing for purposes of cross-context behavioral advertising also constitutes selling as defined by the CCPA, we sell your personal information. However, we will never disclose your personal information in exchange for money. We disclose your personal information under these circumstances only to improve the relevance of the behavioral advertising you receive and measure its effectiveness.

In the past 12 months, we have shared or sold the following categories of personal information:

- » Identifiers, including your name, phone number, email address, and IP address;
- » Network activity, such as the fact that you visited our website; and
- » Geolocation, including country and ZIP code.