



## PRIVACY NOTICE OF COLLECTION OF PERSONAL INFORMATION

Your privacy is important to us. This Privacy Notice of Collection of Personal Information (“Notice”) supplements the information contained in the Consumer Privacy Policy of Valley Strong Credit Union and its subsidiaries (collectively, “Valley Strong,” “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. This notice provides a summary of how we collect, use and share your personal information. We encourage you to read our Consumer Privacy Policy, which is available online at [www.valleystrong.com](http://www.valleystrong.com).

### I. CATEGORIES OF INFORMATION WE COLLECT

We collect the following categories of personal information when you visit our locations, use our ATMs, complete an application for our products, services and employment with us, participate in sweepstakes that we sponsor, or through your other personal interactions with us.

Category	Examples
A. Identifiers	A real name or alias; postal address; signature; home phone number or mobile phone number; bank account number, credit card number, debit card number, or other financial information; physical characteristics or description; email address; account name; Social Security number; driver's license number or state identification card number; passport number; or other similar identifiers.
B. Protected classification characteristics under state or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
C. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
D. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
E. Geolocation data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with your permission in accordance with your mobile device settings and precise geolocation information from GPS-based functionality on your mobile devices.
F. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
G. Professional or employment-related information.	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records
H. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records
I. Inferences drawn from other personal information.	Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

## **Personal information for purposes of the CCPA does not include:**

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical 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 Driver's Privacy Protection Act of 1994.

## **II. HOW WE USE YOUR PERSONAL INFORMATION**

We may use or disclose personal information we collect for one or more of the following operational or other notified purpose ("business purpose"):

- To fulfill or meet the reason for which the information is provided. For example, to process a transaction over an Automated Teller Machine ("ATM") or, for job applicants, to evaluate your candidacy for a job.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our Members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets transferred.
- Advertising our membership, products and services to you.
- Enabling or effecting, directly or indirectly, a commercial transaction.

## **III. SELLING PERSONAL INFORMATION**

We do not sell your personal information for monetary consideration. However, there may be instances where we disclose or share your information with a third party for other valuable consideration. When we refer to "sell," "selling," "sale" or "sold" in this Privacy Policy, we are referring to disclosure or sharing of personal information for valuable consideration other than money.

To opt-out, please visit [www.valleystrong.com](http://www.valleystrong.com) and click on the "Do Not Sell My Info" link. You may also opt-out by calling (800) 221-3311, or by visiting any of our branch locations.

## **IV. CONTACT INFORMATION**

If you have any questions or comments about this Notice or our Privacy Policy, please do not hesitate to contact us at: (800) 221-3311, or by visiting any of our branch locations. Please visit our Consumer Privacy Policy on our website <http://www.valleystrong.com/privacy> for more information about the ways in which we collect and use your personal information and your choices and rights regarding such use under California law.