



PRIVACY NOTICE AT COLLECTION OF PERSONAL INFORMATION

Your privacy is important to us. Valley Strong Credit Union (together with its subsidiaries and affiliates, also referred to as “Valley Strong,” “we,” “us,” or “our” herein) is providing this notice pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). 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.

Application of this Notice

This notice applies to natural residents of the State of California from whom we collect personal information from our interactions, whether such interactions occur online, on our mobile application, on our premises, or other offline interactions.

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, mobile banking 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. Personal information categories described in Cal. Civ. Code § 1798.80(e)	Signature; state identification card number; physical characteristics or description; insurance policy number; education; employment or employment history; bank account number, credit card number, debt card number, or any other financial information; or medical information or health insurance information.
C. 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).
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric information	Physiological or behavioral characteristics observed through security camera footage on facilities we own as well as fingerprints.
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. 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.
H. Sensory data	Audio, electronic, visual, or similar information collected on our monitoring and surveillance systems.

I. Professional or employment-related information.	Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records; Emergency contact information, such as the name, phone number, address and email address of another person in the context of having an emergency contact on file; Personal information necessary for us to collect and retain to administer benefits for you and another personal relating to you (e.g., your spouse, domestic partner, and dependents), such as their name, Social Security number, date of birth, telephone number, email, and address.
J. 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.
K. Inferences drawn from other personal information.	Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
L. Sensitive Personal Information.	A consumer's Social Security, driver's license, state identification card, or passport number; A consumer's 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; A consumer's precise geolocation; A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; A consumer's genetic data; The processing of biometric information for the purpose of uniquely identifying a consumer; Personal information collected and analyzed concerning a consumer's health; and sexual orientation.

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 (FRCA), 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 and to administer employment-related benefits for you, your spouse or domestic partner, and your dependents.
- 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.
- For other lawful purposes.

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.

IV. SHARING PERSONAL INFORMATION FOR CROSS-CONTEXT BEHAVIORAL ADVERTISING

Cross-context behavioral advertising refers to the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly branded websites, applications, or services, other than the business, distinctly branded website, application, or service with which the consumer intentionally interacts.

The following categories of your personal information are shared for cross-context behavioral advertising purposes: D, F, G, K

To opt-out, please visit www.valleystrong.com and click on the “Do Not Sell or Share My Personal Information” link. You may also opt-out by calling (800) 221-3311, or by visiting any of our branch locations.

Retention of Personal Information

The criteria we will use to determine the period of time that we will retain the categories personal information described above depends on our relationship with you and on the following criteria:

- **Laws and regulations.** We are a regulated financial institution that is subject to laws and regulations governing our retention of personal information of our members, applicants for credit union membership, loans and other financial products and services. We are also an employer and, thus, we are subject to labor laws governing how long we must retain information about applicants for employment and current and former employees. Therefore, applicable laws and regulations will govern how long we retain your personal information.
- **Contracts.** We must also retain information for as long as necessary to comply with our contractual duty to you as well as our contractual obligations with our service providers, contractors and other third-parties.
- **Assert and defend against legal actions.** We may retain your personal information for such period as we may need to assert and defend against potential legal actions.

V. 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.