



## California Consumer Privacy Policy Notice Disclosure

### Effective Date: January 1, 2020

Your privacy is important to us. This California Consumer Privacy Policy Notice Disclosure (“Notice”) explains how GECU (collectively, “we,” or “us”) collects, uses and discloses personal information relating to California residents covered by the California Consumer Privacy Act of 2018 (“CCPA”).

### What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.

### Our Collection, Use and Disclosure of Personal Information

We collect Personal Information relating to California residents in a variety of contexts. In the past 12 months, we have collected the following categories of Personal Information relating to California residents:

- Identifiers, such as name, address and Social Security number;
- Personal Information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as transaction and account information;
- Internet or network-activity information, such as browsing history and interactions with our website;
- Geolocation data, such as device location;
- Audio, electronic, visual, or similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer;
- Education information, such as school and date of graduation; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences and characteristics.

For more information about how we collect, disclose and secure information relating to our Individual Members, please refer to our Privacy Notice.

### Sale of Personal Information

In the past 12 months, GECU has not “sold” Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Notice, “sold,” means the disclosure of Personal Information to a third party for monetary or other valuable consideration.

### Requests Under the CCPA

If you are a California resident, you have the right to:

1. Request that we disclose to you the following information covering the 12 months preceding your request:
  - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
  - The business or commercial purpose for collecting Personal Information about you;

- The categories of Personal Information about you that we disclosed to third parties for a business purpose and the categories of third parties to whom we disclosed such Personal Information (if applicable); and
  - The specific pieces of Personal Information we collected about you.
2. Request that we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
  3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and, if we are able to verify your identity, advise you how long we expect that it will take to respond. Requests for specific pieces of Personal Information will require additional information to verify your identity. If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

**In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights. We may decline to delete Personal Information that we collected from you if retaining the information is necessary for us to provide a good or service that you requested or to detect or investigate security incidents or protect against fraud.**

We will advise you in our response if we are not able to honor your request. We will not provide Social Security numbers, driver's license numbers or government-issued identification numbers, financial account numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

### **How to Make Requests**

If you are a California resident, you may make a request by completing the attached Form for Requests under the California Consumer Privacy Act and submitting by using one of the methods outlined below.

1. Mail a copy of the completed form to GECU, PO Box 20998, El Paso, Texas 79998-0998.
2. In-person submission at any GECU Branch located in El Paso, Texas (A branch locator can be found at [gecu.com](http://gecu.com)).
3. Call 915.778.9221 in the El Paso area or 1.800.772.4328 nationwide.
4. Email the completed form to [CCPA@gecu.com](mailto:CCPA@gecu.com).

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

### **Changes to This California Consumer Privacy Policy Notice Disclosure**

We may change or update this Disclosure from time to time. When we do, we will post the revised Disclosure on this page with a new "Last Updated" date.