# PREMIER AMERICA

## NOTICE AT COLLECTION OF PERSONAL INFORMATION

Premier America Credit Union (together with its subsidiaries and affiliates, also referred to as "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 in the course of their acting as a sole proprietor of a business or an owner, officer, director, officer, employee or authorized agent of a legal entity business for which we will open a membership account and/or provide a business loan.

Below are the categories of personal information we collect and the purposes for which we intend to use this information.

#### **Categories Information We Collect**

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; 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, or veteran or military status.
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	Facial recognition, fingerprints, iris or retina scans, keystroke, or other physical patterns.

We will collect the following categories of personal information (which may overlap):

F. Internet or other similar	Search history, browsing history, login information, and IP addresses
network activity	on our information systems and networks.
G. Geolocation data	Time and physical location related to use of an internet website,
	application, device, or physical access to our office or branch locations.
H. Sensory data	Audio, electronic, visual or similar information collected on our
	monitoring and surveillance systems.
I. Professional or employment-	Current or past job history, performance evaluations, disciplinary
related information.	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	Educational records directly related to a student maintained by an
information (per the Family	educational institution or party acting on its behalf, such as grades,
Educational Rights and Privacy	transcripts, class lists, student schedules, student identification codes,
Act (20 U.S.C. Section 1232g,	student financial information, or student disciplinary records.
34 C.F.R. Part 99)).	
K. Inferences drawn from other	Profile reflecting a person's preference, characteristics, psychological
personal information.	trends, predispositions, behavior, attitudes, intelligence, abilities, and
	aptitudes.
L. Sensitive Personal	A consumer's social security, driver's license, state identification
Information.	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 Personal information collected and analyzed
	concerning a consumer's sex life or sexual orientation.

Personal information for purposes of the CCPA does not include:

- Publicly available information.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like personal information covered by certain financial sector laws, such as the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA).

# **Use of Personal Information**

We may use or disclose the personal information we collect to:

- To fulfill or meet the reason for which the information is provided. For example, to open and service your membership account.
- To sell all or part of a loan to which you are obligated as borrower, guarantor, pledgor or other loan party to a third-party.
- 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 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 or others.
- To prevent, detect and investigate security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute 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.

## Selling or Sharing Personal Information

We will not sell your personal information.

# 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.

#### We will not share your personal information for cross-context behavioral advertising purposes.

#### **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.

### **Contact Information**

If you have any questions or comments about this notice, please do not hesitate to contact us at: marketing.requests@premieramerica.com. Please visit our CCPA Privacy Policy on our website <a href="https://www.premieramerica.com/agreements-disclosures">https://www.premieramerica.com/agreements-disclosures</a> 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.