

# PREMIER AMERICA CREDIT UNION

## PRIVACY POLICY

Effective September 5, 2024

### PRIVACY POLICY

We have developed this Privacy Policy to address our collection, use and disclosure of confidential or personally identifiable information. This Privacy Policy applies to all persons and/or businesses who visit our websites as well as those who do business with us. Premier America Credit Union (which also does business as "TOP Premium Finance" and "Premier America Wealth Management Group") are committed to protecting the privacy of our members, customers and website visitors. References to "we," "us," and "our" refer to Premier America Credit Union. References to "you," "your" and "yours" shall mean the members, customers and website visitors. References to "App" refers to our mobile applications that run on smartphones, tablets, and other devices, through which you will be able access Online Banking services. Unless otherwise stated herein, references to our website also include our Online Banking services available through our App.

The following provides a brief explanation of the contents of this Privacy Policy:

- **Online Privacy and Cookie Notice.** The Online Privacy and Cookie Notice discloses how we collect, use, and share information from visitors to our website and users of our App and Online Banking services.
- **U.S. Consumer Privacy Notice.** The U.S. Consumer Privacy Notice discloses how we collect, use, and share the personal information of individuals who apply for or obtain our financial products and services for personal, family, or household purposes as well as other associated individuals, such as joint account holders and account beneficiaries, pursuant to the federal Gramm-Leach Bliley Act ("GLBA").
- **Important Privacy Choices for California Members.** Residents of California who have applied for or obtained our financial products and services for personal, family, or household purposes, may exercise their right to opt-out of our sharing of their personal information with other companies we do business with to provide financial products and services through this form, pursuant to the California Financial Information Privacy Act ("CalFIPA").
- **California Consumer Privacy Act ("CCPA") Privacy Policy.** The CCPA Privacy Policy applies to residents of California to the extent that the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), applies to Premier America Credit Union. The specific personal information that we collect, use, and disclose relating to a California resident in different contexts covered by the CCPA will vary based on our relationship or interaction with that individual. For example, the CCPA Privacy Policy does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the GLBA and CalFIPA). For more information about how we collect, disclose, and secure information relating to these customers, please refer to the U.S. Consumer Privacy Notice.

### ONLINE PRIVACY AND COOKIE NOTICE

This Online Privacy and Cookie Notice ("Online Privacy Notice") describes Premier America Credit Union's online and mobile privacy practices and applies to websites, mobile applications that run on smartphones, tablets, and other devices ("Apps"), and additional services that we offer which link to this Online Privacy Notice.

By using this website or our Apps, you agree to the terms and conditions of this Online Privacy Notice and consent to our online data collection activities as described in this Online Privacy Notice.

The terms "personal information" or "personally identifiable information" used in this Online Privacy Notice refers to information such as your name, mailing address, email address, telephone number, Social Security number, or other information that identifies you. This information may be collected when you voluntarily provide it to us on our website or in our App.

### INFORMATION WE COLLECT ONLINE – AND HOW WE COLLECT IT

You may visit our website to find out about products and services and check rates, without giving us any personal information. We may use software tools and/or "cookies" to track and gather information about your browsing activities in order to analyze usage, target areas for improvement, and create marketing programs to benefit our members or potential members that visit our site. Tracking includes the date and time of visits, pages viewed, time spent on our site, browser types, IP address, and the site visited just before and just after our site. We may also track browsing activities of members who have accounts with Premier America Credit Union and who use Online Banking services. As part of our security procedures for members using our Online Banking to conduct account inquiries and transactions, we require personally

identifiable information such as a login identification (login ID) and password. We may use a cookie to authenticate your request.

## 1) Use of Cookies and Similar Tracking Technologies

The use of cookies and similar tracking technologies (including pixels or clear GIFs, tags, and web beacons) is a common internet practice. Cookies are small text files containing small amounts of information which are downloaded to your computer, smartphone, tablet or other mobile device when you visit a website. Cookies are useful in a number of ways, including allowing a site or mobile app you use to recognize your device, save your settings on a site or mobile app, facilitate navigation, display information more effectively and to personalize the user's experience. Cookies are also used to gather statistical information about how sites and mobile apps are used in order to continually improve design and functionality and assist with resolving questions regarding the sites and mobile apps.

### a. Attributes of Cookies

Cookies set by us are called **first-party cookies**. We may also have **third-party cookies**, which are cookies from a domain different than the domain of the website you are visiting, for our advertising and marketing efforts. There can be first-party and/or third-party cookies within any of the below Categories of Cookies.

Cookies have a duration period. Cookies that expire at the end of a browser session are called "session" cookies. Cookies that are stored longer are called "persistent" cookies. There can be session and/or persistent cookies within any of the below Categories of Cookies. Persistent cookies are stored on your system and can be accessed again for multiple visits. Persistent cookies usually have an expiration date and will be automatically deleted from your system at that time.

Our OB does not pass personally identifiable information through cookies. OB also uses a temporary session cookie, a non-persistent cookie, or a pre-expired cookie. This cookie is used as part of our stringent online security measures to make sure that each page is not cached or saved on your computer (each page must be retrieved from the web server). This cookie is deleted when a user logs or times out of OB, or if the browser window is closed, and ensures that another user on the same computer cannot access the previous user's session or information. If you use Enhanced Login Security, then OB may place a secure persistent cookie on your computer. This secure cookie is unique, and when used in combination with your login information, creates a unique way to identify you to our system. For every login attempt after you add extra security to a computer, this secure cookie is validated along with the login identification you normally enter. This secure cookie is only used to validate your identity and does not contain any personal information. Mobile online banking services available through the App and Bill Pay services may use persistent cookies to speedup identification of device type. This cookie does not contain any personal information.

### b. Categories of Cookies

Below is a list of the types of cookies that may be used in our sites and mobile apps. We classify cookies into the following categories:

**Necessary.** These cookies are necessary for the sites and mobile apps to function and cannot be switched off in our systems. Without these cookies, the sites and mobile apps will not work properly. Examples include setting your privacy preferences, setting your language preferences or logging in in a secured area requiring authentication. Strictly necessary cookies may also detect transmission errors or data loss or distribute network traffic across different servers to ensure accessibility. You can set your browser to block or alert you about these cookies, but that will cause some parts of the site to not work.

**Preferences.** Preference cookies enable the sites and mobile apps to remember information that changes the way that the sites and mobile apps behave or look, like the preferred language or the region that you are in.

**Statistics.** Statistic cookies enable us to measure and improve the performance of our sites and mobile apps. These cookies collect information about how visitors use a site and mobile app, for instance, which pages visitors go to most often and if they get error messages. These cookies can also be used to make collective inferences based on choices and browsing behavior for marketing research.

We use Google Analytics to measure and improve the performance of our site.

To view an overview of the privacy of your Google Analytics cookies please go here: <https://support.google.com/analytics/answer/6004245>.

You may install a Google Analytics opt-out browser add-on by going here: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

**Marketing.** Marketing cookies are used to deliver advertisements that may be relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They are usually placed through our sites and mobile apps by our advertising partners and remember that you have visited a site or mobile app. This information may be shared with other organizations such as advertisers.

**Unclassified.** Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

## c. How to Control and Delete Cookies

### 1. Using Your Browser

Many of the cookies used on our website can be enabled or disabled through our consent tool or by disabling the cookies through your browser. To disable cookies through your browser, follow the instructions usually located within the "Help," "Tools" or "Edit" menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function.

Some browsers may have enabled "do not track" ("DNT") signals. DNT is a signal, sent from an individual's browser to a website via standard web protocols, requesting that a website refrain from tracking an individual's online activities. The World Wide Web Consortium ("W3C") created a working group to standardize this tool. Despite a decade of effort, the DNT project ended when the W3C disbanded the working group in 2019 due to insufficient support and adoption. Because DNT signals and appropriate responses are undefined, our website does not respond to browser DNT signals.

A growing number of browsers are adopting Global Privacy Control ("GPC"), which was created in 2020 and is similar to DNT. The GPC is a technical specification for transmitting universal opt-out signal that communicates a consumer's choice to opt-out of the sale or sharing of their personal information for behavioral advertising. Where required to do so under applicable law, our website will honor GPC signals.

### 2. Using Your Mobile Device

Some mobile devices come with a non-permanent advertising identifier or ID which gives companies the ability to serve targeted ads to a specific mobile device. In many cases, you can turn off mobile device ad tracking or you can reset the advertising identifier at any time within your mobile device privacy settings. You may also choose to turn off location tracking on your mobile device. By turning off ad tracking or location tracking on your mobile device, you may still see the same number of ads as before, but they may be less relevant because they will not be based on your interests.

### 3. Third Party Website Cookies That We Cannot Control

When using our website, you may be directed to other websites for such activities as surveys, completing job applications, and to view content hosted on those sites such as an embedded video or news article. These websites may use their own cookies. We do not have control over the placement of cookies by other websites you visit, even if you are directed to them from our website.

## 2. Geolocation

When allowed by you, our mobile App collects your location data to provide branches and ATMs near you. Location access can be allowed once, only while using the App, or you can choose to not allow location data to be collected.

## 3. IP Addresses

If you log on to OB, you pass through a "firewall" used for security purposes and the Internet Protocol (IP) address associated with the computer you are using may be identified. The IP address does not identify you personally. In certain instances, it may also obtain other information about your computer to better identify you as an online user. This information may be retained in case it is needed for security or protection of member information.

## 4. Social Media

We may collect information, such as your likes, interests, feedback, and preferences when you interact with our official pages on social media websites such as Facebook, Twitter, LinkedIn, YouTube, and Instagram or from our social media partners (but only if you choose to share with them and they, in turn, share that information with us). Please refer to the policies of those companies to better understand your rights and obligations with regard to your activity on those websites.

## HOW WE USE AND SHARE INFORMATION WE COLLECT

We do not and will not sell your personal information. We share your information as required to meet legal and regulatory obligations. We share your personal information that you have provide to us in connection with applying for membership and/or financial products with us ("personally identifiable financial information") with affiliates and third parties in accordance with the practices set forth in the U.S. Consumer Privacy Notice.

With respect to other information that we collect from you online, which includes personal information as well as online activity data that does not personally identify you or your household, we use such information for a variety of reasons, including:

- to present our website and its contents to you;
- to enable you to use online tools or perform certain online transactions;
- to service and manage your account, including responding to or updating you on inquiries, or to contact you about your accounts or feedback;
- to offer you special products and services and deliver advertisements to you in the form of banner ads, interstitial pages (ads that appear as you sign in or sign out of your online accounts) or other promotions;
- to analyze whether our ads, promotions, and offers are effective;
- to help us determine whether you might be interested in new products or services, and to improve existing products and services;
- to verify your identity and/or location to allow access to your accounts and conduct online transactions;
- to manage fraud and data security risk;

- to personalize and optimize your website browsing and app experiences by examining which parts of our website you visit or which aspect of our apps you find most useful;
- to comply with federal, state or local laws; civil, criminal or regulatory investigations; or other legal requirements;
- to share with trusted third parties who are contractually obligated to keep such information confidential; and
- to use it only to provide the services we have asked them to perform.

We disclose your personal information and non-personally identifiable online activity data to third parties for our business purposes. The general categories of third parties that we share with are as follows:

- our third-party service providers;
- other companies to bring you co-branded services, products or programs;
- third parties that help us advertise our products or services;
- third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you;
- third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our company or affiliated business; and
- other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise, to protect the rights, property or security of our customers or third parties.

## MISCELLANEOUS

**App Permissions** - Depending on your device or App permission settings, the App may have access to the following information from your mobile device: Contacts (may have access to your contact information), location (may include precise or approximate location), stored information and photos/media/files (the App may be able to read, modify, or delete the contents of your USB storage), camera (may allow the App to take pictures and videos), Wi-Fi connection information (view your Wi-Fi connections to connect and disconnect from Wi-Fi), phone (may directly call phone numbers), and other information (for example, the App may be able to receive data from the Internet, prevent your device from sleeping, identify your network connections, and obtain full network access).

These App permission settings allow you to access or use certain features within the App. For example, in order to locate the nearest branch to you, the App may need access to your precise location. You may change your App permission settings. By changing your App permission settings, you may affect your ability to access or use certain features on the App. Additionally, you may be able to log into the App using your device's log in features such as using a passcode or your fingerprint. These device log in features are facilitated through your device and not Premier America Credit Union and we have no control over such features, which you can change by accessing your device settings and preferences.

**How You Can Manage Your Information Online** - If you are an OB user, you may access information and update some of your personal information quickly and easily online (e.g., change or reset your PIN, Password, phone number or postal address, including email address(es)).

**Service Providers on the Internet** - Occasionally you will notice on our website that services are "Powered by" or "Provided by" content providers or technology service partners. We contract with these vendors to help serve you better. We are highly selective in choosing these companies, and they are only allowed to use member information for the purpose of providing the contracted services.

**Co-branded and Alliance Relationships** - We have established relationships with other parties on the internet. These other companies are accessed either through the use of, or by offering "co-branded" sites in which both Premier America Credit Union and the other company share the same URL, domain name or pages within a domain name on the internet and the names or logos of both companies are displayed. Generally, we do not own the co-branded sites and therefore do not control how those companies use any information supplied to them. It's important that you review their privacy policy to understand how they manage any information you supply them. However, if you are providing us with information, we will always adhere to our Privacy Policy.

**Online Applications and Forms** - To protect the information you provide us online, we use multiple levels of security. All information sent using an online application or form is encrypted using security certificates issued by VeriSign. You may communicate with us using secure email forms on the website or within OB.

**Email to Premier America Credit Union** - If you send an email outside of the website or OB, that email is not necessarily secure against interception by unauthorized individuals. Therefore, we ask that you not send confidential account information through regular email. We will not transmit, through regular email, sensitive or personal information that can compromise or violate a user's privacy. When you send an email, your email address will be used to reply, and for a limited time your email address, your message, and response for quality assurance purposes may be stored. This may also be done to meet legal and regulatory requirements. If your email address is collected in this manner, it will not be used to notify you about our products and services unless you have provided prior permission.

**Email from Premier America Credit Union and Your Preferences** - Email is sometimes used to inform members about products, services or product enhancements that may be of interest if you have provided permission. When you provide your email address online you will have an opportunity to tell us if you do not wish to receive these messages. You will also have the opportunity to opt out of future messages on each marketing email you receive. There are some types of email, such as eStatement notifications and important disclosures where opting-out is not available.

**Email from Other Sources** - We take your email marketing preference seriously and will not send marketing messages if you tell us you do not want to receive them. Additionally, we will send you email servicing messages only when necessary or at your initiation to quickly deliver important product enrollment, account or service information potentially requiring action on your part. Rest assured, when you receive such messages, they will be clearly marked as coming from us and will not request confidential information.

**Short Message Service (SMS) from Premier America Credit Union and Your Preferences** – SMS/Text is sometimes used to inform members about products, services or product enhancements that may be of interest if you have provided permission. When you provide your mobile phone number, you will have an opportunity to tell us if you do not wish to receive these messages via SMS/text. You will also have the opportunity to opt out of future messages on each SMS/text you receive.

**Text Message Marketing Opt-Ins – Premier America Credit Union** - Sign up to receive important news, information, and promotions from Premier America Credit Union. Message frequency varies. Msg & Data Rates May Apply. By opting in to this service, you consent to receive mobile text alerts using an automatic telephone dialing system. Consent to receive marketing text messages is not required as a condition of purchasing any goods or services. To opt-in, text PACU to 52479. By signing up, you are confirming you are over the age of 13. Text STOP to 52479 to stop receiving Premier America News messages from Premier America Credit Union (you will receive a confirmation text). For additional information, text HELP to 52479 or contact the Contact Center at 1-800-772-4000.

Sign up to receive important news, information, and promotions from Premier America Credit Union at CSUN. Message frequency varies. Msg & Data Rates May Apply. By opting in to this service, you consent to receive mobile text alerts using an automatic telephone dialing system. Consent to receive marketing text messages is not required as a condition of purchasing any goods or services. To opt-in, text CSUN to 68138. By signing up, you are confirming you are over the age of 13. Text STOP to 68138 to stop receiving Premier America News messages from Premier America Credit Union at CSUN (you will receive a confirmation text). For additional information, text HELP to 68138 or contact the Contact Center at 1-800-772-4000.

Supported carriers are:

AT&T, Sprint, T-Mobile®, Verizon Wireless, Boost, Cricket, MetroPCS, U.S. Cellular, Virgin Mobile, Google Voice, ACS Wireless, Advantage Cellular (DTC Wireless), Appalachian Wireless, Atlantic TeleNetwork International (ATN), Bandwidth, Bluegrass Cellular, Buffalo Wireless, CableVision, Carolina West Wireless, Cellcom, Copper Valley, C-Spire Wireless (formerly Cellsouth), Cellular One of East Central Illinois, Chariton Valley Cellular, Cross (dba Sprocket), Duet IP, Element Mobile, EpicTouch, GCI Communications, Golden State, Hawkeye (Chat Mobility), Hawkeye (NW Missouri Cellular), i Wireless (IOWA Wireless), Illinois Valley Cellular, Immix (Keystone Wireless / PC Management), Inland Cellular, Mobi PCS (Coral Wireless LLC), Mosaic, MTA Communications, MTPCS / Cellular One (Cellone Nation), Nex-Tech Wireless, Panhandle Telecommunications, Peoples Wireless, Pine Belt Wireless, Pine Cellular, Pioneer, Plateau, Revol Wireless, RINA, SI Wireless/Mobile Nation, SouthernLinc, SRT Wireless, Thumb Cellular, Union Wireless, United, Viera Wireless, West Central Wireless, Leaco, Nemont/Sagebrush. T-Mobile is not liable for delayed or undelivered messages.

**Ringless VoiceMail from Premier America Credit Union and Your Preferences** – Ringless voicemails is sometimes used to inform members about products, services or product enhancements that may be of interest if you have provided permission. When you provide your phone number online you will have an opportunity to tell us if you do not wish to receive these messages. You will also have the opportunity to opt out of future messages on each marketing message you receive. A ringless voicemail works by delivering pre-recorded messages to members or prospects without either party ever picking up the phone. There are some types of ringless voicemails, such as alerts, notifications and important disclosures where opting-out is not available.

**Suspicious Email** - Should you receive a suspicious email that appears to be from Premier America Credit Union, please let us know by calling 800-772-4000 or 818-772-4000, email us using our secure email form at [www.premieramerica.com](http://www.premieramerica.com), or forward the email to [HBSecurity@premieramerica.com](mailto:HBSecurity@premieramerica.com) You may also wish to contact your Internet Service Provider for support in blocking emails or subscribing to a spam filter.

**Account Aggregators** - Many companies offer account aggregation services that collect information from your accounts and consolidate into one site. In order for this to happen, you have to provide the company with sensitive account information, personal identifiers and an access code, Password or PIN. By giving up your Password or PIN, you are authorizing that company to access your account. All transactions conducted by the account aggregator using an access code you provide to them are considered authorized by you.

**Bill Pay** - If you enroll in Bill Pay within our OB, you should be aware that Bill Pay requires you to provide information about your Payees and Billers including addresses and any corresponding account numbers. The Bill Pay service uses this information to send payments on your behalf to your Payees and Billers for further processing.

**Funds Transfer and Zelle®** - If you enroll in Funds Transfer or Zelle within our OB, you should be aware that you will need to provide routing and account information of your external financial institutions and investment brokers. The Funds Transfer service uses this information to send money between your Premier America Credit Union accounts and your accounts held at other financial institutions or investment brokers. For the Zelle service, you may need to provide routing or account information, email addresses or phone numbers of your contacts. The Zelle service uses this information to send money on your behalf to your contacts for further processing.

**Purchase Rewards - This program ended March 31, 2021 and is no longer available.** If you use OB, you should be aware and agree that you may receive targeted offers from our Purchase Rewards product. To present those offers, the Purchase Rewards product tracks and collects your debit card transaction activity. The product will obtain the merchant names and products purchased via debit card in order to generate targeted offers that will present you with an incentive (cash reward) to purchase the same or similar product from the same, different or similar type of merchant. You may opt-out of Purchase Rewards. To opt-out from Purchase Rewards, please contact us by calling 800-772-4000 or 818-772-4000, or email us using our secure email form within OB.

**Protecting Children's Privacy** - We respect the privacy of children and comply with the practices established under the Children's Online Privacy Protection Act (COPPA). We do not knowingly collect or retain personally identifiable information from consumers under the age of thirteen. For more information about COPPA please visit the Federal Trade Commission website.

**What You Can Do to Help Protect Your Information** - We are committed to protecting your privacy. We suggest you follow these guidelines:

- Protect your account numbers, card numbers, personal identification numbers (PINs), and Passwords. Never keep your PIN with your debit or credit card which would provide free access to your accounts if your card is lost or stolen.
- Use caution when disclosing your account numbers, social security numbers, and other confidential information to other persons. If someone calls you, explains the call is on behalf of Premier America Credit Union and asks for your account number, you should beware. Premier America Credit Union staff will have access to your information and will not need to ask for it.
- It is important that we have your current information so we may reach you. If we detect potentially fraudulent or unauthorized activity or use of any account, we will attempt to contact you immediately. If your address, phone number or email changes, please let us know.

**Links to Non-Premier America Websites** - Premier America Credit Union offers links to other websites. Such sites are not within our control and may not follow the same privacy, security, or accessibility standards as ours. We neither endorse nor guarantee, nor are we responsible for the security, content or availability of their sites. You are encouraged to review the privacy policies of third parties before providing information on their sites.

## U.S. CONSUMER PRIVACY NOTICE

### WHAT DOES PREMIER AMERICA CREDIT UNION (DBA PREMIER AMERICA WEALTH MANAGEMENT GROUP AND TOP PREMIUM FINANCE) DO WITH YOUR PERSONAL INFORMATION?

**Why?** - Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?** - The types of personal information we collect and share depend on the product or service you have with us. This information can include: Social Security number, account balances, assets and income, payment history, electronic bills, and billing, credit history and credit scores, credit card numbers and usage, checking account information, overdraft history, current and past employers and/or financial institutions, email address, consumer purchasing and census data, data transmitted through cell phones and other mobile devices and postal address. Sharing excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties. When you are no longer a member, we continue to share your information as described in this notice.

**How?** - All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Premier America Credit Union (dba Premier America Wealth Management Group and Top Premium Finance) chooses to share; and whether you can limit this sharing.

#### Reasons We Can Share Your Personal Information

Does Premier America share?	Can you limit this sharing?	
Yes	No	<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus
Yes	No	<b>For our marketing purposes</b> – to offer our products and services to you
Yes	No	<b>For joint marketing with other financial companies (Sharing excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties.</b>
No	N/A	<b>For our affiliates' everyday business purposes</b> – Information about your transactions and experiences

No	N/A	<b>For our affiliates' everyday business purposes –</b> Information about your creditworthiness
No	N/A	<b>For our affiliates to market to you</b>
No	N/A	<b>For non-affiliates to market to you</b>

**Questions?** - Call 800-772-4000 (or 818-772-4000), or send an email to [notify@premieramerica.com](mailto:notify@premieramerica.com).

## Who Are We

**Who is providing this notice?** Premier America Credit Union (dba Premier America Wealth Management Group and Top Premium Finance)

## What We Do

**How does Premier America protect my personal information?** - To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also have strict policies, vendor requirements, and staff training all designed to protect your personal information and privacy.

**How does Premier America collect my personal information?** - We collect your personal information, for example, when you open an account, make deposits or withdrawals from your account, pay your bills, apply for a loan, use your credit or debit card, make a wire transfer, show your Driver's License, visit our web site, use our external funds transfer or bill payment services, and complete an application or form. We also collect your personal information from others such as credit bureaus, or other companies.

## Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates "everyday business purposes" information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. California residents, see above for more on your rights under state law.

**What happens when I limit sharing for an account I hold jointly with someone else?** - Your choices will apply to everyone on your account.

## Definitions

**Affiliates** - Companies related by common ownership or control. They can be financial and nonfinancial companies. Premier America Credit Union does not have any affiliates.

**Non-affiliates** - Companies not related by common ownership or control. They can be financial and nonfinancial companies. Premier America Credit Union does not share with nonaffiliates so they can market to you.

**Joint marketing** - A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include insurance companies, insurance brokers and agents, lenders and other financial institutions.

## Other important information

**For California Residents:** Please see the Important Privacy Choices for California Members form to exercise opt-out rights that may be available to you under the California Financial Information Privacy Act that otherwise are not under this U.S. Consumer Privacy Notice provided under federal law. You may also have additional privacy rights under our CCPA Privacy Policy.

# IMPORTANT PRIVACY CHOICES FOR CALIFORNIA MEMBERS

You have the right to control whether we share some of your personal information. Please read the following carefully before you make your choice below.

## YOUR RIGHTS

You have the right to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending information about other products and services.

## YOUR CHOICE

**Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products and Services:** Unless you say "No", we may share personal and financial information about you with outside companies we contract with to provide financial products and services to you.

NO, please do not share my personal financial information with outside companies you contract with to provide financial products and services. Note: Your choice to not share personal financial information does not prohibit the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us.

## TIME SENSITIVE REPLY

You may make your privacy choice at any time. Your choice marked here will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with other companies with whom we contract to provide products and services.

Print Name \_\_\_\_\_ Member Number(s) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

To exercise your choice, please do one of the following:

1. Fill out, sign and mail this form to "Premier America Privacy Preferences", P.O. Box 2178, Chatsworth, CA 91313-2178 (you may want to make a copy for your records)
2. Call 800-772-4000, Monday – Tuesday from 8 a.m. to 5 p.m., Wednesday from 9 a.m. to 5 p.m., Thursday from 8 a.m. to 5 p.m., Friday from 8 a.m. to 6 p.m., or Saturday from 8 a.m. to 1 p.m., PT.
3. Send a secure email request by logging into Online Banking

# CCPA PRIVACY POLICY

Rev. 6/1/2023

This California Consumer Privacy Act Privacy Policy explains how we collect, share, use, and protect your personal information through your online and offline interactions with us. This CCPA Disclosure applies to residents of California to the extent that the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), applies to Premier America Credit Union. As used in this Privacy Policy, "personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. However, personal Information does not include: (i) publicly available information; (ii) deidentified or aggregated consumer information; or (iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act ("FCRA") and the Gramm-Leach-Bliley Act ("GLBA").

The specific personal information that we collect, use, and disclose relating to a California resident in different contexts covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this CCPA Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the GLBA). For more information about how we collect, disclose, and secure information relating to these customers, please refer to our U.S. Consumer Privacy Notice. We may use the information described below for any of the purposes described in this CCPA Disclosure or for our business, security, or operational purposes compatible with the context in which the personal information was collected, unless limitations are listed in this CCPA Disclosure or described elsewhere at the time of collection of the information.

## I. CATEGORIES OF INFORMATION WE COLLECT

In the preceding 12-months, we have collected the following categories of personal information (please note that some categories overlap):

Category	Examples
A. Identifiers	A real name or alias; postal address; signature; home phone number or mobile phone number; membership 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 listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
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	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.
F. Internet or other similar network activity	Browsing history, search history, and 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, precise geolocation information from GPS-based functionality on your mobile devices.
H. Sensory data	Audio, electronic, visual, or similar information.
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, passport number, citizenship, or immigration status.

For purposes of the CCPA, "personal information" does not include:

- Publicly available information.
- De-identified information that cannot reasonably be used to identify you or your household.
- Aggregated consumer information that relates to a group or category of consumers, from which consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device.
- Information excluded from the CCPA's scope like 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. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from consumers or their agents. For example, from forms you complete, when you perform transactions, and when you purchase products or services.
- Indirectly from consumers or their agents. For example, when you use your debit or credit cards, when you make deposits or withdrawals to/from your accounts, or when you pay your bills.
- Directly and indirectly from activity on our website or our mobile applications. For example, from submissions through our website, application portals, or website usage collected automatically.
- From third-parties, such as credit reporting agencies, government agencies, law enforcement agencies, and service providers.

## III. 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 purposes ("business purposes"):

- To fulfill or meet the reason for which the information is provided. For example, if you apply for a loan, we use the information in your loan application to evaluate your credit request and grant you the loan if approved.
- 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, and 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, 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.
- As described to you when collecting your personal information.
- 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.
- As otherwise permitted under law.

With respect to your personal information that is deemed "sensitive personal information" under the CCPA, we do not use or disclose it for any purpose other than, as reasonably necessary and proportionate, for the following purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods and services.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside of your current interaction with us.
- For our service providers or contractors to perform services on our behalf, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services,

providing storage, or providing similar services on our behalf; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.

- To verify or maintain the quality or safety of a service or device that is owned, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured for, or controlled by us; provided, however, that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose.
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about you.

#### IV. HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this CCPA Disclosure, we may disclose your personal information in the following situations:

- **Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer our website, conduct surveys, provide technical support, process payments, assist in the fulfillment of services, and help us market our own products and services.
- **Joint Marketing Partners.** We may share your information with other companies to offer you co-branded financial products and services.
- **Advertising Networks.** We may share your information with advertising networks such as Google and Facebook to help deliver our advertisements to you as you are browsing online.
- **Compliance with Laws and Other Lawful Uses.** We may disclose information to law enforcement agencies and other government entities or private parties in litigation in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information with this parties to establish or exercise our rights, to defend against a claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies. We may also disclose your personal information with our acquisition or merger partners in the event of an acquisition or merger. Furthermore, we may disclose your personal information as permitted by applicable law. All of the categories of personal information we collect from you may disclosed for this purpose.
- **Your Consent.** All the categories of personal information we collect from you may be disclosed to third parties with your consent or direction.

In addition to the information above, California law requires that organizations disclose whether the specific categories of personal information defined in the CCPA have been disclosed to third parties for a “business purpose,” or “sold” or transferred for “valuable consideration, or “shared” for purposes of cross-context behavioral advertising. The table below indicates which of these specified categories we may collect and transfer in a variety of contexts.

CATEGORY OF PERSONAL INFORMATION	CATEGORY OF RECIPIENTS (FOR BUSINESS PURPOSE)	CATEGORY OF RECIPIENTS (FOR “SALE” OR “VALUABLE CONSIDERATION”)	CATEGORY OF RECIPIENTS (CROSS-CONTEXT BEHAVIORAL ADVERTISING)
Identifiers such as name, address, unique personal identifier, email address, or account name.	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Protected classification characteristics under state or federal law	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Commercial information	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.

Biometric information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Internet or other similar network activity	Service providers; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Geolocation data	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Sensory data	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Professional or employment-related information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Non-public education information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Inferences drawn from other personal information	Service providers; Joint marketing partners; Advertising networks; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.
Sensitive personal information	Service providers; Third parties for compliance with laws and other lawful purposes; and Third parties with your consent.	Not sold.	Not shared.

## V. YOUR RIGHTS AND CHOICES

This section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices.

### a. Exceptions

The rights and choices in this Section do **not** apply:

- If you are not a California resident;
- If we collected personal information covered by certain financial sector-specific privacy laws, including the Fair Credit Reporting Act ("FCRA"), the Gramm-Leach-Bliley Act ("GLBA") and/or California Financial Information Privacy Act ("CFIPA"). How we collect, share, use, and protect your personal information is covered under such laws instead of the CCPA; or
- To aggregate consumer information; or
- To deidentified personal information; or
- Publicly available personal information.

### b. Right to Know

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your request and verify that the request

is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, sharing or selling that personal information, as applicable.
- The categories of third parties to whom we disclosed, shared or sold the personal information, as applicable.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a "data portability request").

### **c. Right to Delete**

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
3. Debug to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent;
6. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information; or
7. Comply with a legal obligation.

### **d. Right of Correction**

You have the right to request correction of any personal information that we retain about you that is incorrect. We generally rely on you to update and correct your personal information.

### **e. Exercising Access, Data Portability, Deletion and Correction Rights**

To exercise the access, data portability, deletion and correction rights described above, you or your authorized agent may submit a verifiable consumer request to us by any of the following methods:

- Calling 800-772-4000.
- Submitting a CCPA Submission Form available via <http://premieramerica.com/agreements-disclosures>.
- Mail your request to Premier America Credit Union, P.O. Box 2178, Chatsworth, California 91313-2178, Attn: Member Operations. Include a completed CCPA Submission Form with your request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

When we receive a verifiable request from your authorized agent we may require:

1. Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
2. You may directly verify with us that you have authorized the agent to submit the request.

We will not require either of the above if the authorized agent provides a copy of a power of attorney pursuant to California Probate Code sections 4121 to 4130 and we are able to verify the authorized agent's identity.

We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

We will endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response to the mailing address of record according to our files. For data portability requests, we will select a format to provide your personal information that is readily and should allow you to transmit the information from one entity to another entity without hinderance.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request.

### **f. Right of Non-Discrimination**

We will not discriminate against you for exercising any of your rights in this Disclosure and under applicable laws. Unless permitted by law, we will not deny you goods or services; charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; provide you a different level or quality of goods or services; or suggest that you may receive a different price for goods or services or a different level or quality of goods or services.

**g. Opt-Out Rights Regarding Sale of Personal Information or Sharing Personal Information for Cross Context Behavioral Advertising**

It is not our policy to sell personal information and we have not done so in the preceding 12-month period. In the preceding 12-months, we have not shared your personal information to third-parties for cross-context behavioral advertising purposes.]

**VI. CHANGES TO THIS DISCLOSURE**

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Disclosure, we will post an updated Privacy Policy on our website and mobile application.

**VII. CONTACT INFORMATION**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, call 800-772-4000 or mail us at Premier America Credit Union, P.O. Box 2178, Chatsworth, California 91313-2178, Attn: Member Operations.

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