

## **Website Policy**

Visitors to the All In Credit Union public Web site remain anonymous. The Credit Union does not collect identifying information about visitors to its website.

The Credit Union has included a link to this notice on the introductory page of the website per the terms of the CCPA.

The Credit Union uses standard software to collect non-identifying information about our visitors, such as:

- date and time our site was accessed
- IP address (A numeric address given to servers connected to the Internet)
- Web browser used
- city, state, and country.

The Credit Union uses this information to create summary statistics and to determine the level of interest in information available on our site.

Visitors may elect to provide us with personal information via e-mail or online registration forms. This information is used internally, as appropriate, to handle the sender's request. It is not disseminated or sold to other organizations.

## **California Consumer Privacy Notice**

This Policy applies only to visitors and members that reside in the state of California. This Policy does not apply to information we collect, process, or disclose about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (“Personal Information”). As used in this California Consumer Privacy Notice Disclosure (“CCPA”), Personal Information means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include: (i) publicly available information from government records; (ii) de-identified 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”). For more information about how we collect, use, and disclose information for members, please refer to our Privacy Notice. This notice is viewable with WCAG guidelines.

## **Your Personal Information**

This policy supplements the Credit Union’s privacy policy. Please review that policy to learn about the information we collect, the sources from which we collect it, the purpose for collecting it, and instances where we may share it.

[View our Privacy Policy](#)

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.

In the past 12 months, we have disclosed the following categories of Personal Information relating to California residents to third parties for our business purposes:

- Identifiers, such as name 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.

The Credit Union will not disclose in response to a request to know a member's Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. The Credit Union will inform the consumer with sufficient particularity that it has collected the type of information. For example, the Credit Union shall respond that it collects "unique biometric data including a fingerprint scan" without disclosing the actual fingerprint scan data.

## **Purposes**

The Credit Union uses the Personal Information above for the following purposes:

- Providing, servicing, maintaining, and processing products and services to consumers
- Identifying and preventing fraud
- Identity Verification
- Conducting data analysis and research
- Improving products and services
- Marketing and advertising
- Maintaining internal systems and infrastructure
- Ensuring compliance with all other applicable laws and regulations
- Responding to civil, criminal, or regulatory requests
- For any other use disclosed at or before the point of collecting the Personal Information
- To comply with law, legal process, and internal policies, and exercise and defend legal claims

The Credit Union may also use the Personal Information referenced above for any one of the specific “business purposes” described in the CCPA:

- Auditing related to a current interaction with the consumer
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Identifying and debugging errors that impair functionality
- Permissible short-term transient use

## **Your Rights**

If you are a California resident and are not a job applicant, employee, or an employee of another company interacting with us in your job role, you have the right to request the following information.

- What information we collect and use;
- What information we disclose and sell (if applicable); and
- This request covers the previous (12) months.

To exercise your rights, California residents may contact us to make requests by mail (P.O. Drawer 8, Daleville, AL 36322), by email ([ccpa@allincu.com](mailto:ccpa@allincu.com)), or in person. The response we provide will also explain the reasons we cannot comply with a request, if applicable. The Credit Union will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act. Consumers may make their request by executing a notarized Power of Attorney designating another person to act on their behalf.

## **Right to Deletion**

California residents have the right to request that we delete any of their personal information subject to the various exceptions provided by the CCPA. To protect their information, we can only honor access or deletion requests upon receipt of a verifiable consumer request. The consumer request must provide information that enables the Credit Union to verify his/her identity for us to respond.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which the Credit Union collected the personal information, provided goods or services that the consumer requested, take actions reasonably anticipated within the context of the Credit Union's ongoing business relationship with the consumer, or otherwise provide financial services that perform the banking relationship between the Credit Union and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if the consumer previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on the relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Sale of Information**

Under California law, the Credit Union is required to tell California residents if it "sells" information as that term is defined by applicable law. To sell means to share personal information with a third-party for monetary or other valuable consideration. The Credit Union does not do this based on its understanding of that term. Additionally, the Credit Union does not sell personal information of minors under the age of 16.

### **Non-Discrimination**

The Credit union will not discriminate against a consumer for exercising any of his/her CCPA rights. Unless permitted by the CCPA, the Credit Union will not:

- Deny the consumer goods or services.
- Charge the consumer different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties.
- Provide consumers with a different level or quality of goods or services.
- Suggest that the consumer may receive a different price or rate for goods or services or a different level or quality of goods or services.

The Credit Union may offer a different price, rate, level, or quality of goods or services to the consumer if that price or difference is directly related to the value provided to the consumer by the consumer's data. Such financial incentives shall comply with and as permitted by CCPA, refrain from using financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature.

**Contact Us**

California residents may contact the Credit Union to make requests by mail (P.O. Drawer 8, Daleville, AL 36322), by email ([ccpa@allincu.com](mailto:ccpa@allincu.com)), or in person.

**Updates**

The Credit Union may change this Policy from time to time. The Credit Union will notify the consumer of any material changes to this Policy as required by law. The Credit Union will also post an updated copy on our website. Please check the Credit Union's site periodically for updates. This policy was last updated on August 27, 2020.