



Your privacy is important to FirstLight Federal Credit Union. We do not sell your personal information and are committed to keeping your information secure. This California Consumer Privacy Act Disclosure (“Disclosure”) explains how FirstLight Federal Credit Union (“we” or “us”) collect, use, and disclose personal information relating to California residents that is subject to 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. The CCPA, however, does not apply to certain information, such as information subject to the Gramm- Leach-Bliley Act (“GLBA”). As a result, this Disclosure does not apply with respect to, for example, nonpublic personal information that we collect about California residents in connection with our provision of financial products or services for personal, family, or household purposes (“Members”). For more information about how we collect, disclose, and secure information relating to our Members, please refer to the [FirstLight Privacy Disclosure](#).

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

We collect Personal Information relating to California residents in a variety of contexts, including, for example, collecting Personal Information relating to individuals who may be eligible for products or services but who do not have an existing customer or consumer relationship with us, apply for employment with us or who are our employees, vendors, contractors, or similar personnel, who are beneficiaries or dependents of our employees, or enter into our contests and promotions. The specific Personal Information that we collect, use, and disclose relating to a California resident will depend on our specific relationship or interaction with that individual.

### **Categories of Personal Information We Have Collected and Disclosed for Business Purposes in the Preceding 12 Months**

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

- 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;
- Biometric information, such as fingerprints;
- 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.

### **Business Purposes for Which Personal Information is Collected**

The purposes for which we use Personal Information that we collect depends on our relationship or interaction with a specific California resident. We may use Personal Information to operate, manage, and maintain our



business, to provide our products and services, for our employment and vendor management purposes, and to accomplish our business purposes and objectives, including, for example, using Personal Information to personalize, develop, and market our products and services, conduct research and data analysis, detect and prevent fraud, maintain our facilities, systems and infrastructure, perform accounting, audit, and other internal functions, such as internal investigations, comply with law, legal process, and internal policies, maintain business records, and exercise and defend legal claims.

#### **Categories of Sources from Which Personal Information is Collected**

The categories of sources from which we collect Personal Information depends on our relationship or interaction with a specific California resident and the business purpose for which the Personal Information is collected. We may collect Personal Information directly from California residents or from our affiliates, public records, or third parties such as employers, employment or credit or other references, consumer reporting agencies, or our service providers.

#### **Right to Know About Personal Information Collected or Disclosed and Right to Request Deletion of Personal Information We Collected From You**

If you are a California resident, you may 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.

We do not have to provide this information to you more than twice in any 12-month period.

If you are a California resident, you also have the right to request that we delete Personal Information we collected from you.

If you are a Member, we will decline your request with respect to your GLBA nonpublic personal information. Regardless of whether or not you are an Individual Member, we may also decline to honor your request where a CCPA exception applies. We do not have an obligation under the CCPA to disclose or delete information as described above with respect to information that we collected about a job applicant or employee that we use solely within the context of the individual's role or former role as a job applicant or employee. We may decline to delete Personal Information that we collected from you if we are required by law to retain the information or retaining the information is necessary for us to provide a product or service you requested, detect or investigate security incidents and/or to protect against fraud.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

#### **How to Make Requests**

If you are a California resident, you may make a request for the disclosures described above or make a request to delete Personal Information we collected from you, by contacting us at:



## CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

Effective: 03/31/2022  
Last Updated Date: 03/31/2022

- [Firstlightfcu.org.com/privacy/ccpa-consumer-rights-request](https://firstlightfcu.org.com/privacy/ccpa-consumer-rights-request)

If you are an authorized agent of a California resident, you may make a request using the telephone number or online functionality link above.

### **Verification of Request**

If you make a request above and you are a Member, we will authenticate your identity through your online services or by telephone using our security procedures for this purpose. If you are not a Member, we will verify your identity by associating the information you provide us to any Personal Information that we have collected or otherwise using our vendor for such purposes.

If you are an authorized agent, send us proof that the consumer gave you written permission to submit the request and we will verify your identity as provided above. We may also require the consumer to verify their own identity with us and/or directly confirm with us that they have given you permission to submit the request.

### **Contact Information**

If you have a question or concern about our privacy policies and practices, please contact us at: 1.800.351.1670 and ask to speak with a representative.

### **Changes to This California Consumer Privacy Act 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.