

CommunityAmerica Credit Union Privacy Notice

This Privacy Notice applies to the CommunityAmerica website and mobile applications (each a “Site” or collectively “Sites”), and explains how CommunityAmerica Credit Union (“CACU”) and its affiliates and subsidiaries, including, without limitation, Copper Financial Network, LLC (“Copper” and together with CACU, “we”, “us”, “our”) may collect, use, share, and protect information from or about visitors and users (“you”, “your”) of our Sites.

Please read this Notice carefully. This Notice may change from time to time (see *Changes to our Privacy Notice*).

Information We Collect

Definition of Personal Information

“Personal Information” is information that, either alone or in combination with other information, identifies you. Examples of Personal Information include, among others, name, email address, phone number, and mailing address. Personal Information includes certain information we collect when you apply for, or obtain, a financial product or service from us, which can include your Social Security number, account number, income, account balances, payment history, credit history, and credit scores. When we combine Personal Information with other information, we treat the combined information as Personal Information.

Information You Provide

We collect Personal Information you provide via forms, surveys, applications or other online fields including your name, postal or email addresses, telephone, mobile numbers, or account numbers. The exact information we collect will depend on the purpose of the form. We will indicate on the form whether a particular field of information is mandatory or optional. If you choose not to provide certain information, we may not be able to provide requested services.

Information We Automatically Collect from You

We use technologies that automatically collect information (including Personal Information) about visitors or users of our Sites. For example, the following information may be collected:

- *Cookies.* Cookies are small text files sent by a website server to your device or computer that helps us collect information on how you use the Sites.
- *Device Identifiers.* An ID number transmitted by your mobile device that helps us track unique visitors of our Sites. You may adjust the settings of your mobile device to stop transmitting device identifiers.
- *Web Beacons.* Web beacons (also known as clear gifs, pixel tags, and single-pixel gifs) are small images on a website or email that may be used to measure the effectiveness of our communication with you and tracking the success of our marketing campaigns.
- *Web Server Logs.* Web server logs are records of activity created by the device that delivers the

web pages you request to your internet browser. For example, a web server log may record the search term you entered or the link you clicked on to bring you to the web page. The web server log also may record information about your device, such as your IP address, operating system, and internet browser.

- *Relationship-Based Advertising.* We collect information about our relationship with you (such as types of accounts) and may use that information to help determine which advertisements or offers to present to you.
- *Analytics.* We use Google Analytics and other analytics services to collect information about use of our Sites. Through analytics services, we collect information such as how often users visit this Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. We use this information only to make improvements to the Sites. We do not combine the information collected using Google Analytics with other Personal Information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Use and Google Privacy Policy. Please refer to those policies for more information.
- *Geolocation Data.* We do not track your location unless you specifically initiate this request by using our tools to find the nearest branch or ATM location. You may also limit and customize your location tracking settings for each mobile application on your smartphone.
- *Do Not Track.* We do not track our members over time and across third party websites or online services to provide advertising and therefore do not respond to Do Not Track (DNT) signals. However, some third-party websites and mobile applications do keep track of your browsing activities. If you are visiting such sites, you may wish to set a DNT signal on your browser so that third parties know you do not want to be tracked.

How We Use Personal Information

Our primary purpose in collecting Personal Information is to provide you with the products, services, and information that you request. We may use Personal information to provide maintenance, support, and answer any customer service related questions. We may also aggregate this information with the information other users provide for business purposes such as to analyze data, conduct research, identify usage trends, develop and improve products or services, and Site enhancements. In addition, we may use this data for audit, loss prevention, and anti-fraud purposes and to comply with laws and regulations. We may use information for other purposes not listed here with your consent.

How Personal Information is Shared

We generally do not share Personal Information, except:

1. when it is necessary for our or our affiliates' everyday business purposes, such as maintaining your account, reporting to credit bureaus, or processing a transaction, whether that is to pay an item or to send a notice of dishonor or nonpayment;
2. to service providers who assist us in operating the Sites and our business, to the extent access to Personal Information is necessary for the performance of their services on our

behalf;

3. to exchange, in the normal course of business, credit information with third party financial institutions or other business entities or to the extent a third party is required to verify the existence or condition of your account in accordance with applicable law;
4. to provide information to our regulators or law enforcement when we believe, in good faith, that we have been a victim of a crime or we have observed suspicious activity;
5. to comply with a government agency inquiry, subpoena or court order or a valid attachment, garnishment, or other legal action;
6. in accordance with your consent;
7. to guarantee a check by a third party;
8. at account opening, account renewal, or account review;
9. when we are attempting to collect a debt owed to us;
10. if we sell or otherwise transfer part or the whole of our business or assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), any information collected through the Sites, including Personal Information, may be among the items sold or transferred; or
11. as otherwise permitted by applicable law and appropriate to the circumstance.

In addition, we may from time to time receive credit reports and other information about you, from third parties, in connection with your accounts. Upon request, we will give you the name and address of each third party from which we obtain such a report or information.

How We Protect Personal Information

We have implemented administrative, physical, and technical safeguards to reduce the risk of accidental loss or unauthorized access, use, alteration, and disclosure of Personal Information in our possession or under our control. We take reasonable security measures to ensure sensitive data entered on the Sites is encrypted and transmitted in a secure way.

While we use encryption to protect Personal Information transmitted online, we also protect your information offline. Our employees are periodically trained on the importance of information security and privacy issues to ensure compliance with all applicable laws and regulations. Only employees who need the information to perform a specific role are granted access to Personal Information. The computers and servers on which we store Personal Information are kept in a safe and secure environment.

To protect our members' privacy, we only conduct business with organizations that agree to maintain strong

confidentiality protections and limit the use of information we may provide.

Despite these efforts to store Personal Information in a secure operating environment that is not available to the public, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information. We do not represent or warrant that Personal Information about you will be protected against, loss, misuse, or alteration by third parties.

Retention of Personal Information

We will retain your Personal Information for at least as long as necessary to fulfill the purposes for which your Personal Information has been collected as outlined in this Online Privacy Notice or our Privacy Notice. We also may retain Personal Information to the extent required by law.

Third Party Sites

We may link to other third-party websites or integrate with third-party services and technologies (e.g., financial planning and aggregation tools; social media widgets) not covered by this Notice. Our Sites typically display a pop-up window that will notify you that you are leaving our Sites and ask you to confirm whether you wish to proceed or cancel. If you choose to proceed, please review the online privacy practices of that website to understand how your information may be collected, used, shared, or protected as it may differ from this Notice.

Children's Online Privacy

The Sites are not directed to individuals under the age of 16. We do not knowingly invite or collect Personal Information from children without parental consent.

Correcting, Updating, Accessing, or Removing Personal Information

In addition to other rights you may have depending on where you reside (as described below for EU and California residents), you can request that we correct, update, or delete your Personal Information by emailing a request to us at contactus@cacu.com. We will promptly process such requests in accordance with applicable law.

Individuals in the European Union ("EU") or United Kingdom ("UK")

In this section, we provide additional information relating to how we process Personal Information of individuals in the EU or UK, in accordance with the GDPR. If you need more information or would like to exercise your rights under the GDPR, you may contact us at contactus@cacu.com.

Basis for Processing

Our legal basis for collecting and using the Personal Information described in this Privacy Policy will

depend on the Personal Information concerned and the context in which we collect it. We collect Personal Information from you:

- where we need it to perform a contract with you;
- where the processing is in our legitimate interests (including the purposes described, above, in *How We Use Personal Information*); or
- if we otherwise have your consent.

Your Privacy Rights

Depending on applicable law, you may have the right to:

- **Request access** to Personal Information about you.
- **Request correction** of the Personal Information that we hold about you.
- **Request erasure** of Personal Information about you. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of Personal Information about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of Personal Information about you. You can ask us to suspend the processing of Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of Personal Information to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process Personal Information about you.

If you wish to exercise any of these applicable rights, please contact us at contactus@cacu.com.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at contactus@cacu.com, so we have an opportunity to address your concerns directly before you do so.

Transfers to the U.S.

If you are using the Sites from outside the United States, please be aware that Personal Information will be transferred to, stored, and processed in the United States. Although we take steps to provide adequate safeguards, the data protection laws of the United States might not be as comprehensive as those in your country.

We endeavor to apply suitable safeguards to protect the privacy and security of Personal Information transferred to us in the United States, and to use it only consistent with your relationship with us and the

practices described in this Privacy Policy.

Your California Privacy Rights

California law permits users of our Sites who are California residents to request certain information regarding our use and disclosure of “personal information” and “sensitive personal information” (as defined by California law). To make such a request, please send an email to contactus@cacu.com.

In addition, the state of California provides California residents with certain other rights concerning their Personal Information. This section describes (1) the categories of Personal Information, collected and disclosed by CACU, subject to California privacy law, (2) your privacy rights under California privacy law, and (3) how to exercise your rights.

1. Collection and Disclosure of Categories of Personal Information under California Privacy Law

In accordance with California law, we collected the following categories of Personal Information within the preceding 12 months:

- Identifiers (for example, name, email address, IP address, and online identifiers);
- Internet or other electronic network activity information, including information on your usage of our Sites;
- Geolocation data;
- Inferences drawn from any information identified above to create a profile;
- Information necessary to provide Services, such as account numbers, social security numbers, driver’s license numbers, and other similar information.

CACU discloses each of these categories of Personal Information with our service providers for our business purposes (to enable the service providers to provide their services) and as otherwise described in the “Sharing of Personal Information” section above.

2. Your Privacy Rights Under California Law

Under California law, California consumers have the following rights with respect to their Personal Information:

Privacy Right	Description
Notice	You have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.

Access	You have the right to request information on the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You also have the right to request information on the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Erasure	You have the right to request to have your Personal Information deleted from our servers and we will direct our service providers to do the same. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law; (4) to otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Opt Out of a Sale	CACU has not sold Personal Information about consumers within the 12 preceding months.
Correct	You have the right to request that we correct inaccurate Personal Information.
Know	You have the right to request the identity of third-parties that we share your Personal Information with, and to know what data of yours we share with third-parties.
Opt-Out of Sharing	You have the right to opt-out of or limit the sharing of personal information, including sensitive personal information, to the extent necessary to perform the services we provide.

These rights do not apply to personal information that is collected, processed, sold or disclosed subject to the Gramm-Leach-Bliley Act.

1. How to Enforce Your California Privacy Rights

If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to contactus@cacu.com or call us toll-free at: 844.431.1976. You have a right not to receive discriminatory treatment by any business when you exercise of your California privacy rights.

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- ***Tell Us Which Right You Are Exercising***: Specify which right you want to exercise and the Personal Information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer's behalf.
- ***Help Us Verify Your Identity***: Provide us with information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- ***Direct Our Response Delivery***: Please provide us with an e-mail or mailing address through which we can provide our response. If you make the request by email, unless otherwise requested, we will assume that we can respond to the email address from which you made the request.

Changes to this Notice

We reserve the right to make changes to this Notice at any time. Changes will be effective as of the time the revised content is posted online. When we do, we will revise the updated date at the bottom of this page. If we make material changes to this Notice, we will notify you here, by email, or by means of a notice on the Sites prior to the change becoming effective.

How to Contact Us

If you have any questions about this Notice, or how we use or protect your Personal Information, please contact us at:

CommunityAmerica Credit Union
PO Box 15950
Lenexa, KS 66285-5950

Toll-Free: 844.431.1976

Email: contactus@cacu.com

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