

## **BluPeak Credit Union California Consumer Privacy Act (CCPA) Policy**

### **Important Privacy Information**

At BluPeak Credit Union, we strive to create transparency with our policies and work hard to protect your privacy. During the course of business, personal information is gathered in order to consider applications for products and services, service accounts, and process transactions you request. The information we collect is protected by various federal and state laws including the California Consumer Privacy Act (CCPA).

If you have questions regarding your rights under other federal and state privacy laws, please refer to BluPeak Credit Union's state and federal privacy policies located under the [Privacy and Security](#) section of our website [www.blupeak.com](http://www.blupeak.com).

### **Your Rights Under CCPA**

The CCPA gives California residents additional control over their information including the power to request access to the personal info we have on file for you, the power to request we delete that information, the right to opt-out of the sale of your information, and other related rights.

- A "Request to Know" provides access to what pieces of personal information we collect about you, including:
  - What information we have collected
  - The sources of the information collected
  - Our purpose for collecting the information
  - Any third parties with whom we share your information
- A "Request to Delete" allows you to ask that information we hold on file about you be deleted. Note that not all information is eligible for deletion, including information that we are required to maintain under another state or federal law.
- You can submit a request to opt-out of the sale of your personal information. The sharing of information at BluPeak Credit Union is governed by the California Financial Information Privacy Act, another state law protecting your privacy rights. You can opt-out of information sharing by following the instructions on the [Important Privacy Choices For Consumers](#) notice located under the [Privacy and Security](#) section of our website [www.blupeak.com](http://www.blupeak.com).
- You have the right not to be discriminated against for exercising your rights under the CCPA.
- You have the right to have a legally authorized and verifiable authorized agent, such as a power of attorney, make requests on your behalf.

### **Personal Information - Collection and Sharing Summary Table**

The specific types of Personal Information covered under CCPA that we collect, use, and disclose will vary based on our relationship and interactions with you.

Category	Examples of Information Collected	How do we use it?	Do we share?
<b>Individual Information</b>	Name, address, email, identification, and date of birth	For everyday business purposes including maintaining your account(s), processing your transactions, and offering financial products and services to you	Yes  <i>BluPeak Credit Union shares <u>limited</u> individual information with a joint marketing partner to offer insurance products</i>
<b>Financial Details</b>	Account numbers, debit/credit card numbers, check numbers, transaction details, and account balances	For everyday business purposes including maintaining your account(s), processing your transactions, and reporting to credit bureaus	No
<b>Technology Data</b>	Geographic coordinates, IP address, cell phone tower pings, cookies, user IDs, beacon scanning, in-session digital banking activity, and similar data gathered when accessing our products and services digitally	This helps us deliver a customized banking experience and provide you important communications and promotional offers through push notifications.	No
<b>Bio Metric Data</b>	Such as visual information on a security camera in a branch or at an ATM	The use of cameras and security protocols are designed to ensure safety	No
<b>Mobile App Data</b>	Geolocation-based data, user IDs, and in-session digital banking activity. If enabled, our Mobile App may collect this information even when the app is closed or not in use.	To provide you a customized banking experience. Geolocation-based data is also used to assist you with locating the nearest BluPeak ATM or branch through the Mobile App.	No  <i>Note you may disable or adjust the Location Services at any time through your mobile device's settings.</i>

**Sources of Personal Information**

We obtain your information in the following ways:

- Information you provide directly to BluPeak Credit Union to open an account, apply for a loan, or to provide financial services and transactions at your request
- Information you make publicly available such as on your personal social media posts or that you post on BluPeak's social media posts
- Information you provide within Online Banking to facilitate address changes, check orders, online bill payments and similar services you request
- Information provided to us by third party partners such as consumer reporting agencies used to make decisions about accounts, services, and loans
- Information that your browser may automatically transmit, and information that may be contained in a cookie recorded on your device, accessed/delivered when you visit BluPeak's website such as IP address, device type, device location, browser used etc.

## **How We Use Your Personal Information**

All information we gather, regardless of the source, is treated with the same security and confidentiality standards we afford all sensitive information. Information you provide or that is gathered during our interactions with you, whether in person, on the phone, or on the web, may be used for the following purposes:

- Maintain and service your account(s)
- To communicate with you about your account(s)
- Facilitate a transaction you request
- To offer BluPeak Credit Union products and services to you
- To maintain your account(s) privacy and security
- To comply to applicable state and federal laws
- To provide you with online and mobile device services
- To customize your experience when accessing products and services digitally

## **Information Sharing**

BluPeak Credit Union shares your information with partner vendors/companies to maintain and service your account(s) (such as statement printers) and facilitate transactions you request (such as card processors). We do not share or sell your personally identifiable information to any third parties outside of a joint marketing agreement, and we have not done so in the last 12 months. We may also share information when legally required to do so (such as a subpoena or levy).

## **How To Make A Request**

If you are a California resident or an authorized agent of a California resident, you may make a request to know what personal information we have on file about you and you can request we delete your personal information.

1. Submit a request by calling us at 866-873-4968.
2. Mail a notarized request to BluPeak Credit Union, Attn: Legal/Compliance, 10120 Pacific Heights Blvd. Suite 100, San Diego, CA 92121
3. Visit any one of our convenient branch locations

*Request forms are available on our website at located under the Privacy and Security section of our website [www.blupeak.com](http://www.blupeak.com).*

## **How To Opt-Out**

You can submit a request to opt-out of the sale of your personal information. The sharing of information at BluPeak Credit Union is governed by the California Financial Information Privacy Act, another state law protecting your privacy rights. You can opt-out of information sharing by following the instructions on the Important Privacy Choices For Consumers notice located under the Privacy and Security section of our website [www.blupeak.com](http://www.blupeak.com).

*BluPeak Credit Union reserves the right to make changes to this notice at any time without prior notice.*

## Federal Privacy Policy

### FACTS

#### WHAT DOES BLUPEAK CREDIT UNION 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 and account balances
- Payment history and transaction history
- Credit history and credit score

When you are **no longer** our customer, 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 BluPeak Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does BluPeak Credit Union share?	Can you limit this sharing?
<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</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> — information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For non-affiliates to market to you</b>	No	We don't share

##### Questions?

Call 866.873.4968 or go to [blupeak.com](http://blupeak.com)

## Who we are

**Who is providing this notice?**

BluPeak Credit Union

## What we do

**How does BluPeak Credit Union 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.

**How does BluPeak Credit Union collect my personal information?**

We collect your personal information, for example, when you

- Open an account or apply for a loan
- Make a wire transfer or pay your bills
- Use your credit or debit card

We also collect your personal information from others, such as credit bureaus, affiliates, 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. See below for additional rights under California state law.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *BluPeak Financial Services, LLC*

**Non-Affiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *BluPeak Credit Union does not share with our non-affiliates so they can market to you*

**Joint Marketing**

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- *BluPeak Credit Union's joint marketing partners include companies that offer investment and insurance products*

## Other important information

California provides additional options for members to opt out of certain sharing. Please see the "Important Privacy Choices for Consumers" notice as well as the California Consumer Privacy Act notice in the privacy and security section of our website at [usecu.org](http://usecu.org) for more information.



## State of California Privacy Policy

The State of California requires financial institutions to notify you of your rights. These rights are separate from federal privacy laws and notices. You may have additional rights under the California Consumer Privacy Act. Please visit the privacy and security section of our website at blupeak.com for more information.

### Important Privacy Choices for Consumers

You have the right to control whether BluPeak Credit Union shares some of your personal information. Please read the following information carefully before you make your choices below.

#### Your Rights

You have the following rights 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. This includes sending you information about some other products or services.

#### Your Choice

**Restrict Information Sharing With Companies We Own or Control (Affiliates):** Unless you say “No,” we may share personal and financial information about you with our affiliated companies and outside companies we contract with to provide financial products and services to you.

**NO**, please do not share personal and financial information with your affiliated companies or outside companies.

#### 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 affiliated companies and other companies with whom we have contracts to provide products and services.

**Already opted out? No need to resubmit.**

***If you have already opted out of information sharing as described in this notice in the past, you do not need to submit this form again. We will honor your opt out request permanently, or until revoked by you.***

Account Number(s)	Date
Account Holder Printed Name	Account Holder Signature

To exercise your choices, do one of the following:

1. Fill out, sign and send back this form to us using the envelope provided (make a copy for your records)
2. Call us toll-free at 866.873.4968
3. Send us a Secure Email in Online Banking (log in at blupeak.com). Type “CA Privacy Notice” in the Subject Line and “Opt Out” in the body of the email.