

Effective Date: January 1, 2020

Last Updated: June 25, 2020

Vermont Federal Credit Union (“Vermont Federal”, “we,” or “us”) takes your privacy very seriously. This California Consumer Privacy Notice (“Notice”) explains how we collect, use, and disclose personal information relating to California residents (“consumer” or “you”) covered by the California Consumer Privacy Act of 2018 (“CCPA”). This Notice is provided pursuant to the CCPA. Any terms defined in the CCPA have the same meaning when used in this notice.

This Notice is for California residents only and supplements the information contained in Vermont Federal’s privacy policy.

The CCPA does not apply to certain information that is covered by other regulations, such as the Gramm-Leach-Bliley Act (“GLBA”), the Fair Credit Reporting Act (“FCRA”), and regulations promulgated by the National Credit Union Administration (“NCUA”) and the Consumer Financial Protection Bureau (“CFPB”). Most of the information VERMONT FEDERAL collects is not subject to CCPA.

Also, the specific Personal Information that we collect, use, and disclose relating to California residents covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Notice does not apply to information we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes.

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or our service providers.

Information We Collect

“Personal Information” is defined as 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. We may collect and use the following Personal Information:

Category	Examples
A. Identifiers.	Name, government-issued identifier such as Social Security number, driver’s license number.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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. <i>Some personal information included in this category may overlap</i>

	<i>with other categories.</i>
C. Protected classification characteristics under California or federal law.	Marital status, gender, military status, etc.
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Internet or other network activity.	Browsing history, interactions with our website.
F. Geolocation data.	Device location, Internet Protocol (IP) location.
G. Sensory data.	Audio, electronic, or visual recordings.
H. Professional or employment-related information.	Current or past job history.
I. Education Information	Student records, directory information.
J. Inferences drawn from personal information listed above.	Profile reflecting a person’s preferences and characteristics.

As noted, the majority of Personal Information Vermont Federal collects is related to providing financial services to you and is thus exempt from CCPA. If you do not provide the information we ask for, it may delay or prevent us from providing our services to you. Vermont Federal is providing disclosure of the categories of information above in an effort to provide transparency.

How Your Information is Collected

Vermont Federal obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you – For example, by telephone, email, or text, or from forms completed or products and services you requested.
- From Service Providers – such as to verify your identity when you contact us.
- Indirectly from you, such as from observing actions on our website and mobile apps.
- Credit reporting agencies and public record sources (federal, state, or local government).
- Other third parties you may consent to during a loan application such as employer, landlords, and schools.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill a request for which the information was provided. For example, if you share your name and contact information to request a price quote, apply for membership or a product, or ask a question about our products or services, we will use that personal

information to respond to the inquiry. We may also save the information to facilitate new/future applications or process transactions.

- To provide, support, develop, and personalize your experience on our website, products, and services.
- To create, maintain, customize, and secure your relationship with us.
- To process your requests, applications, transactions, payments, and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
- To personalize your online experience and to deliver content, product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases, other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To respond to law enforcement requests as required by applicable law, court order, or governmental regulations or guidance.
- To meet regulatory requirements, such as the Home Mortgage Disclosure Act.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

VERMONT FEDERAL will not collect additional categories of Personal Information or use the personal Information we have collected for materially different, unrelated, or incompatible purposes without providing notice.

Sharing Personal Information

Vermont Federal may disclose your Personal Information to a third party for business purposes, to perform services for us, or to function on our behalf. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract. We routinely share Personal Information with:

- Service Providers we use to help deliver our products and services to you, such as loan and payment processors;
- Other third parties we use to help us run our credit union, such as website hosts;
- Third parties approved by you, including sites you choose to link your account to or third-party payment providers;
- Credit reporting agencies and sanctions screening providers;
- External auditors; and

- Law enforcement and regulatory agencies to comply with our legal and regulatory obligations.

Sale of Personal Information

In the past 12 months, **Vermont Federal has not “sold” Personal Information subject to the CCPA**, including Personal Information of minors under the age of 16. For purposes of this Notice, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Your Rights under CCPA

If you are a California resident, you have the right to:

- Request that VERMONT FEDERAL disclose to you free of charge the following information covering the 12 months preceding your request:
 - ◆ The categories of Personal Information about you that we collected;
 - ◆ The categories of sources from which the Personal Information was collected;
 - ◆ Our business purpose for collecting Personal Information about you;
 - ◆ The categories of third parties with whom we disclosed that Personal Information and the purpose for disclosing; and,
 - ◆ The specific pieces of Personal Information we collected about you.
- Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
- Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and, if we are able to verify your identity, advise you how long we expect it will take to respond. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA’s access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver’s license numbers or government issued identification numbers,

financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

Questions or Concerns

If you have any questions or comments about this Notice or the ways in which Vermont Federal collects and uses your information, please contact us at:

1. Postal Address:
Vermont Federal Credit Union
Attn: CCPA Inquiry
P.O. Box 407
Burlington, Vt. 05402-0407
2. Phone:
888-252-0202

Ways to exercise your rights under CCPA

California residents can request details about Personal Information collected and shared by calling 800-252-0202 or by sending a secure email through their online banking. Emails must specify "CCPA Inquiry" in the first line of the email. We will reply to CCPA inquiries via U.S. mail.

Changes to This Notice

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this page with a new "Last Updated" date.